

**EXHIBIT E**  
**to Declaration of Rachel S. Doughty**

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
11/29/22	0.5	100.00%	0	A108 Communicate (other external) L110 Fact Investigation/Development	L110 Fact Investigation/Development	Call wtih Bender re 17200 case	Rachel Doughty
11/30/22	0.5		0.5	A108 Communicate (other external) L120 Analysis/Strategy	L120 Analysis/Strategy	unfair competition lawsuit strategy w/ JW	Rachel Doughty
11/30/22	0.1	100.00%	0	A108 Communicate (other external) P280 Other	L120 Analysis/Strategy	Email correspondence w/ Smith and Lowney re potential WA state sister case	Rachel Doughty
11/30/22	0.2		0.2	A102 Research C200 Researching Law	L120 Analysis/Strategy	Research potential UCL claims	Rachel Doughty
12/2/22	0.3	100.00%	0	A108 Communicate (other external) P280 Other	L120 Analysis/Strategy	Confer w/ potential co-counsel	Rachel Doughty
12/5/22	1.2	100.00%	0	A107 Communicate (other outside counsel) L120 Analysis/Strategy	L120 Analysis/Strategy	Call with potential local counsel at Smith & Lowney in Washington and follow up with JW	Jessica Blome
12/5/22	0.1	100.00%	0	A108 Communicate (other external) L120 Analysis/Strategy	L120 Analysis/Strategy	Confer w/ outside counsel re potential collaboration	Rachel Doughty
12/5/22	0.2		0.2	A105 Communicate (in firm) L110 Fact Investigation/Development	L110 Fact Investigation/Development	Review protocal for mercury policy process with staff	Rachel Doughty
12/5/22	0.1	100.00%	0	A105 Communicate (in firm) C200 Researching Law	L120 Analysis/Strategy	Confer w/ Strauss re Toxic Cosmetics Act	Rachel Doughty
12/5/22	1.2	100.00%	0	A107 Communicate (other outside counsel) L120 Analysis/Strategy	L120 Analysis/Strategy	Call with potential local counsel at Smith & Lowney in Washington and follow up with JW	Rachel Doughty
12/6/22	0.2	100.00%	0	A106 Communicate (with client) L120 Analysis/Strategy	L120 Analysis/Strategy	update re WA state possibility	Rachel Doughty
12/6/22	0.3	100.00%	0	A105 Communicate (in firm) L120 Analysis/Strategy	L120 Analysis/Strategy	Confer w/ JB by email re how to bring MPP case in federal court	Rachel Doughty
12/6/22	0.2	100.00%	0	A105 Communicate (in firm) L110 Fact Investigation/Development	L110 Fact Investigation/Development	Confer re Amazon k choice of law provision application to our case	Rachel Doughty
12/7/22	0.2	100.00%	0	A105 Communicate (in firm) L110 Fact Investigation/Development	L110 Fact Investigation/Development	Exchange emails with RSD after review of various evidence from client	Jessica Blome
12/7/22	0.2	100.00%	0	A105 Communicate (in firm) L190 Other Case Assessment, Development and Administration	L190 Other Case Assessment, Development and Administration	Confer with RSD re: strategy for getting best outcome for client	Jessica Blome
12/12/22	0.1	100.00%	0	A106 Communicate (with client) L110 Fact Investigation/Development	L110 Fact Investigation/Development	Email corr w/ client re adjacent ebay case	Rachel Doughty

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
12/13/22	0.1		0.1	A105 Communicate (in firm) C200 Researching Law	L120 Analysis/Strategy	Email correspondence w/ AS re updated memo on 17200	Rachel Doughty
12/14/22	0.5	100.00%	0	A108 Communicate (other external) L120 Analysis/Strategy	L120 Analysis/Strategy	Confer w/ Lexington Law Group	Rachel Doughty
12/14/22	0.1	100.00%	0	A105 Communicate (in firm) C200 Researching Law	L120 Analysis/Strategy	Email CORR w/ AS re memorandum on 17200 case--Toxic-free cosmetics act inclusion	Rachel Doughty
1/4/23	0.1	100.00%	0	A105 Communicate (in firm) L110 Fact Investigation/Development	L110 Fact Investigation/Development	Confer with RSD re: strategy for testing products b/c sold into California	Jessica Blome
1/4/23	1		1	A104 Review/analyze C200 Researching Law	L120 Analysis/Strategy	Review AS's memo on UCL causes of action using Sherman Act violations, follow up research, discuss with RSD, and email co-counsel with thoughts	Jessica Blome
1/4/23	0.2		0.2	A105 Communicate (in firm) C200 Researching Law	L120 Analysis/Strategy	Communication in firm re potential UCL case	Rachel Doughty
1/4/23	0.2	100.00%	0	A102 Research C200 Researching Law	L120 Analysis/Strategy	Confer w/ co-counsel (JB) re standing for MPP	Rachel Doughty
1/5/23	0.7		0.7	A107 Communicate (other outside counsel) L120 Analysis/Strategy	L120 Analysis/Strategy	Confer with JW, RSD re: plan for structuring case	Jessica Blome
1/5/23	0.8	100.00%	0	A105 Communicate (in firm) L190 Other Case Assessment, Development and Administration	L190 Other Case Assessment, Development and Administration	Plan for expectationas for Michael re potential UCL case	Rachel Doughty
1/6/23	0.1	100.00%	0	A105 Communicate (in firm) L120 Analysis/Strategy	L120 Analysis/Strategy	Confer with co-counsel RE funding strategies	Jessica Blome
1/6/23	0.9	100.00%	0	A106 Communicate (with client) L120 Analysis/Strategy	L120 Analysis/Strategy	Discussing potential litigation with Michael Bender	Rachel Doughty
1/6/23	0.6	100.00%	0		C400 Third Party Communication	Discussing funding for project with Weissglass	Rachel Doughty
1/6/23	0.3	100.00%	0		C400 Third Party Communication	Funding call with Rose Foundation	Rachel Doughty
1/9/23	0.5	100.00%	0		C400 Third Party Communication	Review Ariel memo and send email to M. Bender re basis for UCL claim	Rachel Doughty

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
1/9/23	0.2	100.00%	0	A108 Communicate (other external) P280 Other	C400 Third Party Communication	Speaking to Rose Foundation re funding	Rachel Doughty
1/10/23	1.8	100.00%	0	Case Assessment, Development and Administration	L120 Analysis/Strategy	Prepare litigation memo for Tides Center	Rachel Doughty
1/10/23	0.2	100.00%	0	external) L190 Other Case Assessment, Development and Administration	C400 Third Party Communication	Call w/ Rose Foundation's Jodene Isaacs	Rachel Doughty
1/10/23	0.4	100.00%	0	A108 Communicate (other external) L190 Other Case Assessment, Development and Administration	C400 Third Party Communication	Jodene re MPP funding from Rose Foundation	Rachel Doughty
1/16/23	0.2	100.00%	0	A106 Communicate (with client) L120 Analysis/Strategy	C400 Third Party Communication	Confer w/ M. Bender re strategy on MPP funding source	Rachel Doughty
1/16/23	0.7	100.00%	0	A108 Communicate (other external) P280 Other	C400 Third Party Communication	Send fundraising letter to Rose fdn	Rachel Doughty
1/18/23	0.2	100.00%	0	A108 Communicate (other external) P100 Project	C400 Third Party Communication	Email CORR w/ Rose Fdn re funding	Rachel Doughty
1/19/23	0.7	100.00%	0	A106 Communicate (with client) L120 Analysis/Strategy	L120 Analysis/Strategy	re Meeting with the AG	Rachel Doughty
1/19/23	0.1		0.1	A105 Communicate (in firm) C200 Researching Law	L120 Analysis/Strategy	Research re CPSC case	Rachel Doughty
1/19/23	0.3	100.00%	0	A106 Communicate (with client) L120 Analysis/Strategy	L120 Analysis/Strategy	Report on call with the AG from MPP: follow up email to AG re common interest agreement	Rachel Doughty
1/19/23	1		1	A102 Research L110 Fact Investigation/Development	L110 Fact Investigation/Development	CPSC task re RSD	Rae Lovko
1/21/23	0.1	100.00%	0	A106 Communicate (with client) L120 Analysis/Strategy	L120 Analysis/Strategy	Email CORR w/ client conveying AG message	Rachel Doughty
1/23/23	0.2	100.00%	0		C400 Third Party Communication	Prepare email to M. Bender re common interest agreement; confer w/ co-counsel re same	Rachel Doughty
1/23/23	0.3	100.00%	0	A108 Communicate (other external) P280 Other	C400 Third Party Communication	Confer w/ MB and with AG's office re common interest agreement	Rachel Doughty

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
1/2/24	0.2			A105 Communicate (in firm) 0.2 L120 Analysis/Strategy	L110 Fact Investigation/Development	Review creams posted on Etsy	Rachel Doughty
1/2/24	0.2	100.00%		A105 Communicate (in firm) L110 Fact 0.1 Investigation/Development	L110 Fact Investigation/Development	Confer w/ staff and add investigator initial row to spreadsheet	Rachel Doughty
1/2/24	0.7	100.00%		A103 Draft/revise L250 Other Written Motions and 0.1 Submissions	C400 Third Party Communication	Prepare Proposition 65 Notice of Violation	Rachel Doughty
1/3/24	2			A104 Review/analyze L110 Fact 2.1 Investigation/Development	L110 Fact Investigation/Development	Etsy Product Review (discovery timeline). Checked notice letter (sender list and purchased products)	Karishma Goswami
1/3/24	0.1			A101 Plan and prepare for L140 Document/File Management	C400 Third Party Communication	Calendar meeting w PS re. Prop 65 Notice + Cert of Merit	Nuria de la Fuente
1/3/24	0.1			A101 Plan and prepare for L140 Document/File Management	C400 Third Party Communication	Review email thread re Prop 65 Notice + Cert of Merit	Nuria de la Fuente
1/3/24	0.2			A103 Draft/revise L250 Other Written Motions and 0.2 Submissions	C400 Third Party Communication	Prepare notice letter	Rachel Doughty
1/3/24	0.1			A105 Communicate (in firm) L110 Fact 0.1 Investigation/Development	L110 Fact Investigation/Development	Confer w/ staff re fact investigation tasks	Rachel Doughty
1/3/24	0.1			A103 Draft/revise L250 Other Written Motions and 0.1 Submissions	C400 Third Party Communication	Prepare prop 65 notice letter	Rachel Doughty
1/4/24	0.2			A101 Plan and prepare for L140 Document/File Management	C400 Third Party Communication	Review Etsy email threads before meeting w PS and add comments to Prop 65 Notice	Nuria de la Fuente
1/4/24	1.3			A105 Communicate (in firm) L140 Document/File Management	L110 Fact Investigation/Development	Confer with PS re sender list and Etsy house rules for submitting a regulatory request. Also discussed Cert of Merit and how to label the exhibits. Reviewed product investigation protocol and purchasing of products found by KG survey on 1/3/23	Nuria de la Fuente

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
1/4/24	0.2		0.2	A103 Draft/revise L250 Other Written Motions and Submissions	C400 Third Party Communication	Confer w/ staff re changes to notice of violation	Rachel Doughty
1/4/24	0.1		0.1	A108 Communicate (other external) L350 Discovery Motions	L110 Fact Investigation/Development	Email CORR w/ clerk re discovery	Rachel Doughty
1/9/24	0.1	100.00%	0	A105 Communicate (in firm) L140 Document/File Management	L110 Fact Investigation/Development	Discuss with RL purchases and use of database	Rachel Doughty
1/9/24	0.4		0.4	A103 Draft/revise L250 Other Written Motions and Submissions	C400 Third Party Communication	Prepare notice COM support to send to AG	Rachel Doughty
1/9/24	0.1	100.00%	0	A105 Communicate (in firm) L140 Document/File Management	L140 Document/File Management	Discuss with RD purchases and use of database	Rae Lovko
1/10/24	1.3	100.00%	0	A101 Plan and prepare for L110 Fact Investigation/Development	L110 Fact Investigation/Development	Meeting with As You Sow about Etsy Review	Karishma Goswami
1/10/24	1.7	100.00%	0	A104 Review/analyze L110 Fact Investigation/Development	L110 Fact Investigation/Development	Reviewed new database and provided feedback. Completed Etsy review of rows 3-78 on the spreadsheet.	Karishma Goswami
1/10/24	0.3		0.3	A103 Draft/revise L110 Fact Investigation/Development	L110 Fact Investigation/Development	Batetamps on Corr document for Pooja. Call with Nuria about Product Purchasing	Karishma Goswami
1/10/24	0.5		0.5	A110 Manage data/files L140 Document/File Management	L110 Fact Investigation/Development	Purchase SLPs found during Etsy.com review	Nuria de la Fuente
1/10/24	0.1	100.00%	0	A105 Communicate (in firm) L100 Project Administration	L140 Document/File Management	Confer w/ Walter re database creation to track products	Rachel Doughty
1/10/24	0.5		0.5	A105 Communicate (in firm) L110 Fact Investigation/Development	L110 Fact Investigation/Development	Confer w/ assistant & investigator at AYS re Etsy shopping	Rachel Doughty
1/10/24	0.5	100.00%	0		L140 Document/File Management	Work on database	Rachel Doughty
1/10/24	0.1		0.1	A111 Other L110 Fact Investigation/Development	L110 Fact Investigation/Development	Purchased Etsy skin cream	Rae Lovko
1/11/24	0.1	100.00%	0	A105 Communicate (in firm) L140 Document/File Management	L110 Fact Investigation/Development	Communicate s PS re bates numbers and setting up adobe account	Nuria de la Fuente

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
1/11/24	0.6	100.00%	0	A110 Manage data/files L140 Document/File Management	L140 Document/File Management	Research how to remove Bates numbers that accrobat does not see and call acrobat for help	Nuria de la Fuente
1/11/24	0.1	100.00%	0	A105 Communicate (in firm) L140 Document/File Management	C400 Third Party Communication	Confer w RD re not removing old bates numbers from COM	Nuria de la Fuente
1/11/24	0.6	100.00%	0	A110 Manage data/files L140 Document/File Management	C400 Third Party Communication	Add new bates numbers and trouble shoot reason pdf pages are different sizes. Call Adobe for assistance and correct problem	Nuria de la Fuente
1/11/24	0.1	100.00%	0	A105 Communicate (in firm) L140 Document/File Management	C400 Third Party Communication	Send final version w Bates to atty for review	Nuria de la Fuente
1/11/24	0.3		0.3	A110 Manage data/files L140 Document/File Management	L110 Fact Investigation/Development	Purchase slp's	Nuria de la Fuente
1/11/24	0.2		0.2	A105 Communicate (in firm) L140 Document/File Management	C400 Third Party Communication	Confer w PS re the structure of the Prop 65 COM Support Exhibits to be compiled for the Prop 65 Notice	Nuria de la Fuente
1/11/24	0.1		0.1	A105 Communicate (in firm) L110 Fact Investigation/Development	L110 Fact Investigation/Development	Discuss purchase of Caratone cream	Rachel Doughty
1/11/24	0.1	100.00%	0	A105 Communicate (in firm) L110 Fact Investigation/Development	L140 Document/File Management	Work with Walter on database access	Rachel Doughty
1/11/24	2.3		2.3	A103 Draft/revise P280 Other	C400 Third Party Communication	Prepare 60 day notice letter	Rachel Doughty
1/11/24	0.4	100.00%	0	A110 Manage data/files L110 Fact Investigation/Development	L110 Fact Investigation/Development	Screenshots taken/saved for ordered cream	Rae Lovko
1/12/24	4.3	100.00%	0	A103 Draft/revise L110 Fact Investigation/Development	L110 Fact Investigation/Development	Call with Rachel, Nuria and Pooja about Index for Prop 65 notice. Edited index and updated exhibits for Prop 65 notice. Updated the service list and uploaded to drive.	Karishma Goswami

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
1/12/24	1.5	100.00%		A105 Communicate (in firm) L140 Document/File Management	C400 Third Party Communication	Etsy meeting Re. Prop 65 Not to AG. Collaborate to organize and put together index, with supporting evidence to present Notice to AG	Nuria de la Fuente
1/12/24	0.4		0.4	A103 Draft/revise P280 Other	P280 Other	Prepare Certificate of Merit support; confer w/ staff re same	Rachel Doughty
1/12/24	0.8		0.8	A103 Draft/revise L430 Written Motions and Submissions	C400 Third Party Communication	Prepare notice letter--meet with staff to finalize COM support	Rachel Doughty
1/12/24	0.1	100.00%		A105 Communicate (in firm) L250 Other Written Motions and Submissions	C400 Third Party Communication	Confer w/ assistant re final elements of notice	Rachel Doughty
1/12/24	0.2		0.2	A103 Draft/revise L250 Other Written Motions and Submissions	C400 Third Party Communication	Finalize COM support service list and appendix A	Rachel Doughty
1/12/24	0.4		0.4	A103 Draft/revise L250 Other Written Motions and Submissions	C400 Third Party Communication	Prepare proof of service for notice	Rachel Doughty
1/12/24	0.6		0.6	A103 Draft/revise L250 Other Written Motions and Submissions	C400 Third Party Communication	Prepare notice, send to client for approval	Rachel Doughty
1/16/24	0.4		0.4	A110 Manage data/files L140 Document/File Management	C400 Third Party Communication	Prepare mailing list for mail merge	Nuria de la Fuente
1/16/24	0.1	100.00%		A105 Communicate (in firm) L140 Document/File Management	C400 Third Party Communication	Call KG to coordinate service list and verify her work ours on Wed and Fri	Nuria de la Fuente
1/16/24	1.4	100.00%		A110 Manage data/files L140 Document/File Management	C400 Third Party Communication	Research mail merge and mass mailing instructions for service to AG. Called staps.com for new updated software instructions to complete mass mailing	Nuria de la Fuente
1/16/24	0.2		0.2	A105 Communicate (in firm) P100 Project Administration	P100 Project Administration	Call with client to approve notice run tomorrow; confer w/ staff re setting up the same	Rachel Doughty

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
1/17/24	3.6			A101 Plan and prepare for L140 3.6 Document/File Management	L140 Document/File Management	Updating service list. Printing service packages.	Karishma Goswami
1/17/24	2.2			A110 Manage data/files L140 2.2 Document/File Management	L110 Fact Investigation/Development	Add photos of purchased products to product folder	Nuria de la Fuente
1/17/24	0.1			A105 Communicate (in firm) L140 Document/File Management 0.1 Management	L110 Fact Investigation/Development	Confer with JD and KG re Etsy surveying task work split up	Nuria de la Fuente
1/17/24	1			A108 Communicate (other external) 1 Law	C200 Researching Law	Look for notice address cases; email Rueben Y re same	Rachel Doughty
1/17/24	0.1			A103 Draft/revise L250 Other Written Motions and 0.1 Submissions	C400 Third Party Communication	Prepare service list	Rachel Doughty
1/17/24	0.2			A102 Research C200 0.2 Researching Law	C200 Researching Law	Look for Illinois sales case re notice requirements	Rachel Doughty
1/17/24	0.5			A103 Draft/revise L250 Other Written Motions and 0.5 Submissions	C400 Third Party Communication	Review recent case law re notices, update notice, prepare to send	Rachel Doughty
1/17/24	0.3			A105 Communicate (in firm) L250 Other Written Motions 0.3 and Submissions	C400 Third Party Communication	Confer w/ staff re notice proof of service	Rachel Doughty
1/17/24	0.2			A103 Draft/revise L250 Other Written Motions and 0.2 Submissions	C400 Third Party Communication	Prepare notice POS	Rachel Doughty
1/18/24	2.3			A110 Manage data/files L140 2.3 Document/File Management	C400 Third Party Communication	Edit and finalize format of service list for the county district attys, city attys, the AG and the noticed parties	Nuria de la Fuente
1/18/24	0.6			A110 Manage data/files L140 0.6 Document/File Management	C400 Third Party Communication	Print service packets for mail service of prop 65 notice and service list and Appendix A	Nuria de la Fuente
1/18/24	0.5			A110 Manage data/files L140 0.5 Document/File Management	C400 Third Party Communication	Compile pdfs of Prop 65 Notice documents for 60-Day Notice Service to the AG	Nuria de la Fuente
1/18/24	0.8	100.00%		A110 Manage data/files L140 0 Document/File Management	C400 Third Party Communication	Call Adobe for help troubleshooting document combining for Prop 65 Notice	Nuria de la Fuente

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1/18/24	0.2		0.2	A105 Communicate (in firm) L140 Document/File Management	C400 Third Party Communication	Review mail service list to verify that it is complete w RD	Nuria de la Fuente
1/18/24	0.2		0.2	A110 Manage data/files L140 Document/File Management	C400 Third Party Communication	E-serve Prop 65 Notice letter	Nuria de la Fuente
1/18/24	0.3		0.3	A110 Manage data/files L140 Document/File Management	C400 Third Party Communication	Print address labels for envelopes with defective postage address printing	Nuria de la Fuente
1/18/24	0.1		0.1	A110 Manage data/files L140 Document/File Management	C400 Third Party Communication	Download and save email confirming e-service of of Prop 65 Notice	Nuria de la Fuente
1/18/24	0.2		0.2	A110 Manage data/files L140 Document/File Management	C400 Third Party Communication	Make certificate of service to City of LA	Nuria de la Fuente
1/18/24	0.1		0.1	A110 Manage data/files L140 Document/File Management	C400 Third Party Communication	Print certificate of service to City of LA and prepare postage	Nuria de la Fuente
1/18/24	0.4		0.4	A110 Manage data/files L140 Document/File Management	C400 Third Party Communication	Prepare and serve 60-Day Notice of Prop 65 notice, certificate of merit and service list to the AG through the DOJ portal	Nuria de la Fuente
1/18/24	0.4		0.4	A110 Manage data/files L140 Document/File Management	C400 Third Party Communication	Compile Certificate of Merit Support and index for submission to the AG via 60-Day Not portal	Nuria de la Fuente
1/18/24	0.1	100.00%	0	A110 Manage data/files L140 Document/File Management	C400 Third Party Communication	Call DOJ Prop 65, 60-Day portal for instruction re uploading multiple files and exhibits	Nuria de la Fuente
1/18/24	0.3	100.00%	0	A103 Draft/revise L250 Other Written Motions and Submissions	C400 Third Party Communication	Assist staff in finalizing notice run	Rachel Doughty
1/18/24	2.5	100.00%	0	A103 Draft/revise P100 Project Administration	P100 Project Administration	Assist staff with notice run	Rachel Doughty
1/19/24	0.2		0.2	A110 Manage data/files L140 Document/File Management	L110 Fact Investigation/Development	Send Etsy slp purchase receipts to CB with email expalanation	Nuria de la Fuente
1/19/24	0.1		0.1	A105 Communicate (in firm) L140 Document/File Management	L110 Fact Investigation/Development	Confer w RL Re. screenshots for Etsy slp she purchased	Nuria de la Fuente

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1/19/24	0.3		0.3	A105 Communicate (in firm) L140 Document/File Management	L110 Fact Investigation/Development	Take screenshots of purchase documentation for the slp's purchased on RL's Etsy account	Nuria de la Fuente
1/19/24	0.2		0.2	A105 Communicate (in firm) L140 Document/File Management	L110 Fact Investigation/Development	Confer w KG Re. Etsy SLP's she purchased form her personal account and get screenshot of receipt and payment details	Nuria de la Fuente
1/19/24	0.2		0.2	A110 Manage data/files L140 Document/File Management	L110 Fact Investigation/Development	Create all etsy slp receipts folder and save all receipts tracked down in a uniform format	Nuria de la Fuente
1/19/24	0.1		0.1	A110 Manage data/files L140 Document/File Management	L110 Fact Investigation/Development	Enter RL purchase info in to Etsy Products Master sheet 1	Nuria de la Fuente
1/19/24	0.2		0.2	A110 Manage data/files P280 Other	P280 Other	Screenshots of product purchased/filed	Rae Lovko
1/22/24	0.2		0.2	A104 Review/analyze L250 Other Written Motions and Submissions	C400 Third Party Communication	Review tentative and staff entry of deadlines	Rachel Doughty
1/24/24	3.6		3.6	A102 Research L110 Fact Investigation/Development	L110 Fact Investigation/Development	Completing discovery timeline for etsy products	Karishma Goswami
1/24/24	0.5	100.00%	0	A105 Communicate (in firm) L140 Document/File Management	L110 Fact Investigation/Development	Call with PS to explain process of screen-capturing Etsy purchases. Also explained why she should purchase slp's using her personal account	Nuria de la Fuente
1/24/24	0.3		0.3	A110 Manage data/files L140 Document/File Management	L110 Fact Investigation/Development	Add Etsy cancelled orders to Etsy master spread sheet	Nuria de la Fuente
1/24/24	0.2		0.2	A101 Plan and prepare for L140 Document/File Management	L110 Fact Investigation/Development	manually fix the orientation of some checkout screenshots by KG and task KG to do the same with all the screenshots she has saved for al the products	Nuria de la Fuente
1/24/24	0.1		0.1	A101 Plan and prepare for L140 Document/File Management	L110 Fact Investigation/Development	Task KG to enter purchased products in to etsy master sheet 1 and give instructions for labeling	Nuria de la Fuente

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1/24/24	0.6		0.6	A105 Communicate (in firm) L110 Fact Investigation/Development	L110 Fact Investigation/Development	Confer w/ assistant re purchase of creams in notice sent to As You Sow	Rachel Doughty
1/24/24	0.1		0.1	A108 Communicate (other external) P280 Other	P280 Other	First email from opposing counsel, Etsy matter	Rachel Doughty
1/25/24	0.4		0.4	A105 Communicate (in firm) L140 Document/File Management	L110 Fact Investigation/Development	Communicate with Pooja to verify correct links for Hnub cream purchases on Etsy	Nuria de la Fuente
1/25/24	0.1		0.1	A105 Communicate (in firm) L140 Document/File Management	L110 Fact Investigation/Development	Confer w/ atty for direction on which and what qty of SLP's to purchase from the 'Hnub' brand cream	Nuria de la Fuente
1/25/24	0.4		0.4	A110 Manage data/files L140 Document/File Management	C400 Third Party Communication	Update "Copy of Proposition 65 Service List" per the read email confirmation. email atty a Q Re. confirmed service reply. Also confer with RD re. reply from Sac AG reply email	Nuria de la Fuente
1/25/24	0.2		0.2	A108 Communicate (other external) P100 Project Administration	P100 Project Administration	Email correspondence w/ opposing counsel; update agenda for first call w/ opposing counsel	Rachel Doughty
1/25/24	0.1		0.1	A105 Communicate (in firm) L250 Other Written Motions and Submissions	C400 Third Party Communication	Confer w/ staff re read receipts from public enforcers on notice letter	Rachel Doughty
1/25/24	0.1		0.1	A105 Communicate (in firm) L110 Fact Investigation/Development	L110 Fact Investigation/Development	Confer w/ contractor re purchase of skin whitening creams from burner accounts	Rachel Doughty
1/25/24	0.2		0.2	A105 Communicate (in firm) L110 Fact Investigation/Development	L110 Fact Investigation/Development	Confer w/ Pooja re investigation purchases; refund her	Rachel Doughty
1/25/24	0.1		0.1	A105 Communicate (in firm) L110 Fact Investigation/Development	L110 Fact Investigation/Development	REIM staff for purchase of creams	Rachel Doughty
1/26/24	0.9	100.00%	0	A103 Draft/revise L110 Fact Investigation/Development	L110 Fact Investigation/Development	updating purchase information, troubleshooting with Pooja, adjusting orientation of my screenshots, updating the investigations protocol document.	Karishma Goswami

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
1/26/24	0.2			A110 Manage data/files L140 0.2 Document/File Management	L110 Fact Investigation/Development	Enter OC info and company info into Clio Matter and link to matter	Nuria de la Fuente
1/29/24	0.5			A108 Communicate (other external) L140 Document/File Management	L110 Fact Investigation/Development	Call UPS to track slp ordered from Etsy and change delivery address	Nuria de la Fuente
1/30/24	0.6			A108 Communicate (other external) L110 Fact 0.6 Investigation/Development	L110 Fact Investigation/Development	Meet w/ opposing counsel first time	Rachel Doughty
1/30/24	0.2			A102 Research C200 0.2 Researching Law	C200 Researching Law	Confer w/ staff re retailer benefits (5 day defense) and responsibilities (upstream disclosures) and need for letter re same	Rachel Doughty
1/31/24	1.6			A103 Draft/revise L110 Fact 1.6 Investigation/Development	L110 Fact Investigation/Development	Converting PS screenshots to PDFs organizing in Hnub Yiqi folder.	Karishma Goswami
2/1/24	0.1	100.00%		A110 Manage data/files L140 0 Document/File Management	L110 Fact Investigation/Development	Make sure all of PS receipts for etsy slps are in rcpt folder	Nuria de la Fuente
2/1/24	0.5			A110 Manage data/files L140 0.5 Document/File Management	L110 Fact Investigation/Development	Review KG screenshots organization in product folders and Etsy Products 'sheet 1'	Nuria de la Fuente
2/1/24	0.1			A105 Communicate (in firm) L140 Document/File Management	L110 Fact Investigation/Development	Call from PS as a follow up to email re. jpgs of sample checkout screenshots and folder organization	Nuria de la Fuente
2/2/24	3.4			A103 Draft/revise L140 3.4 Document/File Management	L140 Document/File Management	Fixing uploads to Hnub Yiqi folder.	Karishma Goswami
2/2/24	0.1			A105 Communicate (in firm) L140 Document/File Management	L110 Fact Investigation/Development	Respond to CB email re SLP Receipt tracking and organization	Nuria de la Fuente
2/2/24	0.2			A105 Communicate (in firm) L140 Document/File Management	L110 Fact Investigation/Development	Call PS Re. screenshots in her computer	Nuria de la Fuente
2/2/24	0.2			A105 Communicate (in firm) L140 Document/File Management	L110 Fact Investigation/Development	Send KG purchase info and screenshots for slps purchased by RL and confer re. folder and sample label organization	Nuria de la Fuente

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
2/2/24	0.1		0.1	A105 Communicate (in firm) L140 Document/File 0.1 Management	L110 Fact Investigation/Development	Confer w KG re. GFL internal labeling of slp samples	Nuria de la Fuente
2/6/24	0.1		0.1	A105 Communicate (in firm) L140 Document/File 0.1 Management	C400 Third Party Communication	Confer wi RD Re. exhibit numbers	Nuria de la Fuente
2/6/24	0.2	100.00%	0		L110 Fact Investigation/Development	Task KG to get Etsy order confirmations from burner email	Nuria de la Fuente
2/6/24	0.1		0.1	A105 Communicate (in firm) L140 Document/File 0.1 Management	C400 Third Party Communication	Confer w ND Re. exhibit numbers	Rachel Doughty
2/6/24	0.2		0.2	A105 Communicate (in firm) P280 Other	P280 Other	Confer with RL re AG's letter on notice	Rachel Doughty
2/6/24	0.1		0.1	A105 Communicate (in firm) L110 Fact Investigation/Development	L110 Fact Investigation/Development	Confer w/ co-counsel re responding to AG request for additional language	Rachel Doughty
2/6/24	0.2		0.2	A105 Communicate (in firm) P280 Other	P280 Other	Confer with RD re AG's letter on notice	Rae Lovko
2/6/24	0.4		0.4	A104 Review/analyze P280 0.4 Other	P280 Other	Review of AG amicus in Lee as pertains to 60-day notice requirements; review Etsy notice	Rae Lovko
2/6/24	0.2		0.2	A105 Communicate (in firm) P280 Other	P280 Other	Communicate with PS re gathering of information for AG	Rae Lovko

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
2/7/24	1.8			A103 Draft/revise L140 1.8 Document/File Management	L140 Document/File Management	Printed notice for Madera and Riverside Counties, stuffed envelopes. Moved Notice Letter documents into DOCKET Folder. Uploaded email confirmations for E-104, 015, 016 and searched for E-012 and E-026. Confirmed emails for notices that bounced. Contacted Etsy seller for canceled hnuh yiqi orders.	Karishma Goswami
2/7/24	0.3			A105 Communicate (in firm) 0.3 L250 Other Written Motions and Submissions	C400 Third Party Communication	Confer w/ staff re response to AG re COM support	Rachel Doughty
2/7/24	0.3			A106 Communicate (with client) 0.3 L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Confer w/ client re settlement terms, send email to opposing counsel requesting more time to allow client discussion	Rachel Doughty
2/7/24	2.6			A108 Communicate (other 2.6 external) P280 Other	P280 Other	Compiling document exhibits for AG	Rae Lovko
2/7/24	0.2			A104 Review/analyze P280 0.2 Other	P280 Other	Review of PS work on COM support spreadsheet	Rae Lovko
2/8/24	0.1	100.00%		A108 Communicate (other 0.1 external) L110 Fact Investigation/Development	L110 Fact Investigation/Development	Confer w/ Walter re database entries for this matter	Rachel Doughty
2/8/24	0.1	100.00%		A105 Communicate (in firm) 0.1 L110 Fact Investigation/Development	L110 Fact Investigation/Development	Set up database evidence entry for assistant	Rachel Doughty
2/8/24	0.1			A105 Communicate (in firm) 0.1 P280 Other	P280 Other	Confer with PS regarding draft response to AG	Rae Lovko

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
2/8/24	0.8		0.8	A103 Draft/revise P280 Other	P280 Other	Draft reply to AG re COM support documents; upload to box.com	Rae Lovko
2/9/24	2.1	100.00%	0	A101 Plan and prepare for L110 Fact Investigation/Development	L110 Fact Investigation/Development	Entering data into database, emailing prop 65 labs for testing, re-organizing product purchase photos, communicate with Jesus	Karishma Goswami
2/9/24	1		1	A101 Plan and prepare for L190 Other Case Assessment, Development and Administration	L190 Other Case Assessment, Development and Administration	Take photos of slps received from Etsy vendors	Nuria de la Fuente
2/9/24	0.3		0.3	A103 Draft/revise L250 Other Written Motions and Submissions	C400 Third Party Communication	Review letter to AG in response to COM support questions	Rachel Doughty
2/9/24	1		1	A105 Communicate (in firm) L250 Other Written Motions and Submissions	C400 Third Party Communication	Confer w/ co-counsel re response to AG	Rachel Doughty
2/9/24	0.3		0.3	A102 Research C200 Researching Law	C200 Researching Law	Research Proposition 65 warning req' in state testing concern	Rachel Doughty
2/9/24	0.4		0.4	A105 Communicate (in firm) L110 Fact Investigation/Development	L110 Fact Investigation/Development	Confer w/ assistant re database entries and finding labs	Rachel Doughty
2/9/24	1.2		1.2	A103 Draft/revise P280 Other	P280 Other	Review PS draft; edit draft letter to AG	Rae Lovko
2/9/24	0.2		0.2	A105 Communicate (in firm) P280 Other	P280 Other	Discuss response to AG with RD	Rae Lovko
2/9/24	0.9		0.9	A110 Manage data/files P280 Other	P280 Other	Receiving Etsy creams; photograph	Rae Lovko
2/12/24	0.2		0.2	A110 Manage data/files L140 Document/File Management	L110 Fact Investigation/Development	Download Etsy Products rcv'd photos for distribution into folders	Nuria de la Fuente
2/12/24	0.2		0.2	A110 Manage data/files L140 Document/File Management	L110 Fact Investigation/Development	Email KG instructions to save products rcv'd photos into designated folders	Nuria de la Fuente
2/13/24	0.1		0.1	A106 Communicate (with client) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Email to client seeking input on settlement terms	Rachel Doughty

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
2/14/24	2.7			A102 Research L140 Document/File Management	L140 Document/File Management	etsy discovery timeline. emails to product testing companies. table for rachel. updated database (entered all brands). looked for contact info for sellers. found list of products sold on etsy after knowledge and/or notice letters.	Karishma Goswami
2/14/24	0.2			A110 Manage data/files L140 Document/File Management	L110 Fact Investigation/Development	Upload products received photos into distribution folder	Nuria de la Fuente
2/14/24	0.9			A108 Communicate (other external) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Call with Etsy attorneys re settlement potential, exchange of information	Rachel Doughty
2/14/24	0.9			A108 Communicate (other external) L110 Fact Investigation/Development	L110 Fact Investigation/Development	Discuss evidence gathering with associate	Rachel Doughty
2/14/24	0.3			A104 Review/analyze L110 Fact Investigation/Development	L110 Fact Investigation/Development	Review posts of skin whitening cream on Etsy after knowledge letter	Rachel Doughty
2/14/24	0.3			A101 Plan and prepare for P280 Other	P280 Other	Address emails regarding COM support from AG and RD	Rae Lovko
2/15/24	0.3			A101 Plan and prepare for L110 Fact Investigation/Development	L110 Fact Investigation/Development	Unpacked all Etsy rcv'd slp's and confirmed brands purchased	Nuria de la Fuente
2/15/24	0.3			A105 Communicate (in firm) L140 Document/File Management	L110 Fact Investigation/Development	Confer w attys re. slp's purchase from Etsy	Nuria de la Fuente
2/15/24	0.5			A110 Manage data/files L140 Document/File Management	C400 Third Party Communication	create com support exhibits	Nuria de la Fuente
2/15/24	0.9			A110 Manage data/files L140 Document/File Management	C400 Third Party Communication	Bookmark com support exhibits and assemble with exhibits and index	Nuria de la Fuente
2/15/24	0.2			A105 Communicate (in firm) L140 Document/File Management	L110 Fact Investigation/Development	Confer w atty re. Etsy product master sheet organization	Nuria de la Fuente

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
2/15/24	0.3		0.3	A103 Draft/review L250 Other Written Motions and Submissions	C400 Third Party Communication	Email correspondence w/ AG and staff re COM support	Rachel Doughty
2/15/24	0.2		0.2	A105 Communicate (in firm) P100 Project Administration	P100 Project Administration	Email correspondence w/ staff re responding to AG	Rachel Doughty
2/15/24	0.6		0.6	A105 Communicate (in firm) L110 Fact Investigation/Development	L110 Fact Investigation/Development	Respond to AG re COM support	Rachel Doughty
2/15/24	1		1	A105 Communicate (in firm) L110 Fact Investigation/Development	L110 Fact Investigation/Development	Confer w/ staff re product purchases	Rachel Doughty
2/15/24	4.3		4.3	A111 Other P280 Other	P280 Other	Purchase Etsy creams; screenshots; manage files	Rae Lovko
2/15/24	0.4		0.4	A105 Communicate (in firm) P280 Other	P280 Other	Communicate with Nuria on COM Support exhibits	Rae Lovko
2/15/24	2.2		2.2	A111 Other P280 Other	P280 Other	Work on COM support; updating products; communications with RD and staff regarding ordering procedures	Rae Lovko
2/16/24	1		1	A105 Communicate (in firm) L120 Analysis/Strategy	L120 Analysis/Strategy	Confer w/ staff re letter to AG and settlement letter	Rachel Doughty
2/16/24	0.5		0.5	A102 Research L120 Analysis/Strategy	L120 Analysis/Strategy	Research on notice and exposure requirements	Rae Lovko
2/16/24	1.1		1.1	A102 Research L110 Fact Investigation/Development	L110 Fact Investigation/Development	Research on product testing	Rae Lovko
2/16/24	1		1	A105 Communicate (in firm) L120 Analysis/Strategy	L120 Analysis/Strategy	Confer w/ RD re letter to AG and settlement letter	Rae Lovko

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
2/16/24	0.3			A105 Communicate (in firm) L110 Fact 0.3 Investigation/Development	L110 Fact Investigation/Development	Communication with PS regarding FOIL request to NYC Health	Rae Lovko
2/16/24	1.2			A102 Research L120 1.2 Analysis/Strategy	L120 Analysis/Strategy	Prop 65 research for AG response	Rae Lovko
2/16/24	1.3			A102 Research L120 1.3 Analysis/Strategy	L120 Analysis/Strategy	Research on Prop 65 notice and COM provisions	Rae Lovko
2/16/24	2.6			2.6 A103 Draft/revise P280 Other	P280 Other	Drafting of letter to AG	Rae Lovko
2/20/24	0.3			A105 Communicate (in firm) L110 Fact 0.3 Investigation/Development	L110 Fact Investigation/Development	Confer w/ colleague re letter in response to AG	Rachel Doughty
2/20/24	0.4			A104 Review/analyze L120 0.4 Analysis/Strategy	L120 Analysis/Strategy	Review RD edits to draft letter to AG	Rae Lovko
2/20/24	0.3			A105 Communicate (in firm) L110 Fact 0.3 Investigation/Development	L110 Fact Investigation/Development	Confer w/ colleague re letter in response to AG	Rae Lovko
2/20/24	4.2			4.2 A103 Draft/revise P280 Other	P280 Other	Edit letter to AG; prepare accompanying exhibits	Rae Lovko
2/20/24	0.6			A103 Draft/revise L110 Fact 0.6 Investigation/Development	L110 Fact Investigation/Development	Update Etsy Product spreadsheet with current listings	Rae Lovko
2/21/24	1.9	100.00%	0		C400 Third Party Communication	Reviewing comm support for Rae, discovery timeline	Karishma Goswami
2/21/24	0.1			A105 Communicate (in firm) L140 Document/File Management	L110 Fact Investigation/Development	Reply to tentative meeting re.prop 65 debrief	Nuria de la Fuente
2/21/24	0.7			A105 Communicate (in firm) 0.7 L120 Analysis/Strategy	L120 Analysis/Strategy	Confer w/ colleague re planning for filing complaint, additional notice, response to AG, settlement offer to opposing counsel	Rachel Doughty
2/21/24	0.2			A105 Communicate (in firm) L110 Fact 0.2 Investigation/Development	L110 Fact Investigation/Development	Confer w/ assistant re labs for testing products	Rachel Doughty

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
2/21/24	0.2			A105 Communicate (in firm) L110 Fact 0.2 Investigation/Development	L110 Fact Investigation/Development	Review and discuss content of records request to NY state re test results supporting public health notices	Rachel Doughty
2/21/24	0.2			A102 Research C200 0.2 Researching Law	C200 Researching Law	Research 25249.7(i) re AG must keep confidential COM support	Rachel Doughty
2/21/24	0.5			0.5 A103 Draft/revise P280 Other	P280 Other	Edits to letter to AG	Rae Lovko
2/21/24	0.7			A103 Draft/revise C400 Third Party Communication 0.7	C400 Third Party Communication	Draft/edit FOIA request to New York Department of Health; send	Rae Lovko
2/21/24	0.7			A105 Communicate (in firm) 0.7 L120 Analysis/Strategy	L120 Analysis/Strategy	Confer w/ colleague re planning for filing complaint, additional notice, response to AG, settlement offer to opposing counsel	Rae Lovko
2/21/24	0.1			A105 Communicate (in firm) L110 Fact 0.1 Investigation/Development	L110 Fact Investigation/Development	Communicate with KG re proof of citations	Rae Lovko
2/21/24	4.4			A103 Draft/revise L160 4.4 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	draft settlement offer	Rae Lovko
2/21/24	0.1			A105 Communicate (in firm) L110 Fact 0.1 Investigation/Development	L110 Fact Investigation/Development	Email KG re ordering of Etsy products	Rae Lovko
2/21/24	0.8			A101 Plan and prepare for C400 0.8 Third Party Communication	C400 Third Party Communication	Compilation of documents for next COM Support	Rae Lovko
2/22/24	1			A103 Draft/revise C400 Third Party Communication 1	C400 Third Party Communication	Final edits to letter to AG	Rae Lovko
2/22/24	0.4	100.00%		A103 Draft/revise C400 Third Party Communication 0	C400 Third Party Communication	Recover letter to AG (file corrupted)	Rae Lovko
2/22/24	0.4			A101 Plan and prepare for C400 0.4 Third Party Communication	C400 Third Party Communication	Prepare dividers for exhibits to AG letter	Rae Lovko
2/22/24	0.1			0.1 A108 Communicate (other external) P280 Other	P280 Other	Receipt email re FOIL request; create file	Rae Lovko

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
2/22/24	0.4			A106 Communicate (with client) P280 Other	P280 Other	Communicate with RD re letter to attorney general; sent draft to client	Rae Lovko
2/23/24	0.2			A110 Manage data/files L140 Document/File Management	L110 Fact Investigation/Development	Reply to attys re scheduling time to photoshoot slps an schedule photoshoot time	Nuria de la Fuente
2/23/24	1.5	100.00%	0	A105 Communicate (in firm) L140 Document/File Management	C400 Third Party Communication	Etsy Notice debriefing meeting	Nuria de la Fuente
2/23/24	1.8			A105 Communicate (in firm) 1.8 P280 Other	P280 Other	Staff meeting on next 60-day notice and COM support	Rachel Doughty
2/23/24	0.3			A103 Draft/revise L250 Other Written Motions and 0.3 Submissions	C400 Third Party Communication	Finalize letter to the AG re COM support; email w/ client re same; send same	Rachel Doughty
2/23/24	0.8		0.8	A103 Draft/revise L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Prepare settlement offer; review UCL memo ISO that claim	Rachel Doughty
2/23/24	0.1		0.1	A105 Communicate (in firm) L110 Fact Investigation/Development	L110 Fact Investigation/Development	Emails with staff and RD regarding purchased creams	Rae Lovko
2/23/24	1.8		1.8	A105 Communicate (in firm) 1.8 P280 Other	P280 Other	Staff meeting on next 60-day notice and COM support	Rae Lovko
2/23/24	2.3	100.00%	0	A110 Manage data/files L110 Fact Investigation/Development	L110 Fact Investigation/Development	Receive, catalog, and photograph creams	Rae Lovko
2/26/24	0.1			A110 Manage data/files L140 Document/File Management	C400 Third Party Communication	Print com support index tables and confer w RL Re. Which slps to send to lab	Nuria de la Fuente
2/26/24	0.1			A104 Review/analyze P280 Other	P280 Other	Review RD edits to settlement letter	Rae Lovko
2/26/24	1	100.00%	0	A110 Manage data/files L140 Document/File Management	L110 Fact Investigation/Development	Upload photographs; file creation	Rae Lovko

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
2/26/24	0.2		0.2	A105 Communicate (in firm) P280 Other	P280 Other	Discussion with Nuria about spreadsheet columns	Rae Lovko
2/26/24	0.3		0.3	A105 Communicate (in firm) L110 Fact Investigation/Development	L110 Fact Investigation/Development	Communication regarding which products to send to lab for testing	Rae Lovko
2/27/24	0.5	100.00%	0	A105 Communicate (in firm) L120 Analysis/Strategy	L120 Analysis/Strategy	Call with RSD to discuss litigation strategy	Jessica Blome
2/27/24	0.1		0.1	A105 Communicate (in firm) L110 Fact Investigation/Development	L110 Fact Investigation/Development	Confer w/ staff re testing of product	Rachel Doughty
2/27/24	0.2		0.2	A104 Review/analyze L110 Fact Investigation/Development	L110 Fact Investigation/Development	Correspondence w/ AG and then followup with collaborators re same	Rachel Doughty
2/27/24	0.8		0.8	A102 Research C200 Researching Law	C200 Researching Law	Research law to counter AG position on testing	Rachel Doughty
2/27/24	0.2	100.00%	0	A102 Research C200 Researching Law	C200 Researching Law	Resarch Fong AB 3004 bill	Rachel Doughty
2/27/24	0.4		0.4	A105 Communicate (in firm) L110 Fact Investigation/Development	L110 Fact Investigation/Development	Email to RD regarding products received by GFL	Rae Lovko
2/27/24	0.1		0.1	A105 Communicate (in firm) L110 Fact Investigation/Development	L110 Fact Investigation/Development	Emails regarding ordered products to be sent to lab for testing	Rae Lovko
2/27/24	0.3		0.3	A105 Communicate (in firm) L110 Fact Investigation/Development	L110 Fact Investigation/Development	Review AG email; discuss with RD	Rae Lovko
2/27/24	0.1		0.1	A110 Manage data/files P280 Other	P280 Other	Calendar FOIL response due date; create file	Rae Lovko
2/28/24	3.2		3.2		C400 Third Party Communication	supplemental notice with Pooja, Response to opposing counsel for Rachel	Karishma Goswami

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
2/28/24	0.1		0.1	A108 Communicate (other external) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Confer w/ opposing counsel re notice issues, settlement terms	Rachel Doughty
2/28/24	0.3		0.3	A108 Communicate (other external) L120 Analysis/Strategy	L120 Analysis/Strategy	Confer w/ JW re UCL claims	Rachel Doughty
2/28/24	0.3		0.3	A108 Communicate (other external) L110 Fact Investigation/Development	L110 Fact Investigation/Development	Prepare list for opposing counsel re products sold after knowledge letter	Rachel Doughty
2/28/24	1.3		1.3	A103 Draft/revise L110 Fact Investigation/Development	L110 Fact Investigation/Development	Prepare table of products remaining on Etsy for Opposing Counsel	Rachel Doughty
2/28/24	0.1		0.1	A106 Communicate (with client) L120 Analysis/Strategy	L120 Analysis/Strategy	Confer w/ client re settlement offer, adding UCL/MPP, AG comments on COM	Rachel Doughty
2/28/24	0.1		0.1	A105 Communicate (in firm) P280 Other	P280 Other	Discussion with KG regarding La Tia Mana product	Rae Lovko
2/28/24	0.5		0.5	A103 Draft/revise P280 Other	P280 Other	Prepare Prop65 flowchart re: procedures for employees to follow	Rae Lovko
2/29/24	0.6		0.6	A101 Plan and prepare for L440 Other Trial Preparation and Support	L440 Other Trial Preparation and Support	Prepare COC, cover letters for slips that will be sent to lab	Nuria de la Fuente
2/29/24	0.6		0.6	A101 Plan and prepare for L440 Other Trial Preparation and Support	L440 Other Trial Preparation and Support	Prepare postage and package slips to lab	Nuria de la Fuente
2/29/24	0.6		0.6	A101 Plan and prepare for L440 Other Trial Preparation and Support	L440 Other Trial Preparation and Support	Confer w RL re. CaroWhite sample to be sent to lab and re-do COC and cover letter	Nuria de la Fuente
2/29/24	0.4		0.4	A110 Manage data/files L140 Document/File Management	L110 Fact Investigation/Development	Take SLP samples to post office	Nuria de la Fuente
2/29/24	0.3		0.3	A105 Communicate (in firm) L250 Other Written Motions and Submissions	C400 Third Party Communication	Prepare supplemental notice	Rachel Doughty

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
2/29/24	0.1		0.1	A105 Communicate (in firm) L110 Fact Investigation/Development	L110 Fact Investigation/Development	Confer w/ staff re review of table showing sales after knowledge to give to Etsy attys	Rachel Doughty
2/29/24	0.1		0.1	A105 Communicate (in firm) L140 Document/File Management	L110 Fact Investigation/Development	Confer with Nuria about products sent to lab for testing	Rae Lovko
2/29/24	2.3		2.3	A104 Review/analyze L110 Fact Investigation/Development	L110 Fact Investigation/Development	Review spreadsheet to be sent to OC	Rae Lovko
3/1/24	1.1		1.1	A102 Research L110 Fact Investigation/Development	L110 Fact Investigation/Development	discovery timeline	Karishma Goswami
3/1/24	1.1		1.1	A103 Draft/revise L250 Other Written Motions and Submissions	C400 Third Party Communication	Prepare supplemental notice; direct staff re preparation of service list	Rachel Doughty
3/1/24	0.7		0.7	A103 Draft/revise L250 Other Written Motions and Submissions	C400 Third Party Communication	Prepare settlement letter	Rachel Doughty
3/1/24	0.9		0.9	A103 Draft/revise P280 Other	P280 Other	Work with staff on new notice to Etsy	Rachel Doughty
3/4/24	0.2	100.00%	0	A105 Communicate (in firm) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Discuss strategy on settlement with JB	Rachel Doughty
3/4/24	0.2		0.2	A105 Communicate (in firm) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Discuss strategy on settlement with JB	Rachel Doughty
3/5/24	1.5	0.00%	1.5	A110 Manage data/files L140 Document/File Management	L110 Fact Investigation/Development	Verify all Public Prosecutors Accepting Electronic Service of Notices or mail service are correctly enter in our service list spreadsheet	Nuria de la Fuente
3/5/24	0.2		0.2	A105 Communicate (in firm) L140 Document/File Management	C400 Third Party Communication	Confer w/ KG and PS re. service list	Nuria de la Fuente
3/5/24	0.2		0.2	A105 Communicate (in firm) L140 Document/File Management	C400 Third Party Communication	Confer w/ PS re. remaining tasks for supplemental notice	Nuria de la Fuente

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
3/5/24	1.5			A110 Manage data/files L140 1.5 Document/File Management	C400 Third Party Communication	Verify all Public Prosecutors Accepting Electronic Service of Notices or mail service are correctly enter in our service list spreadsheet	Nuria de la Fuente
3/5/24	0.2			A105 Communicate (in firm) L140 Document/File Management	C400 Third Party Communication	Confer w/ KG and PS re. service list	Nuria de la Fuente
3/5/24	0.2			A105 Communicate (in firm) L140 Document/File Management	C400 Third Party Communication	Confer w/ PS re. remaining tasks for supplemental notice	Nuria de la Fuente
3/5/24	0.2			A105 Communicate (in firm) 0.2 P280 Other	P280 Other	Confer w/ assistant re service list for notice	Rachel Doughty
3/5/24	0.3			A105 Communicate (in firm) 0.3 P280 Other	P280 Other	Confer w/ co-counsel re service list for Etsy Notice 2	Rachel Doughty
3/5/24	0.2			A105 Communicate (in firm) 0.2 P280 Other	P280 Other	Confer w/ assistant re service list for notice	Rachel Doughty
3/5/24	0.3			A105 Communicate (in firm) 0.3 P280 Other	P280 Other	Confer w/ co-counsel re service list for Etsy Notice 2	Rachel Doughty
3/6/24	0.6			A110 Manage data/files L140 0.6 Document/File Management	C400 Third Party Communication	Verify all Etsy sellers are in service list and update with missing info	Nuria de la Fuente
3/6/24	0.6			A110 Manage data/files L140 0.6 Document/File Management	C400 Third Party Communication	Verify all Public Prosecutors are in service list and update	Nuria de la Fuente
3/6/24	0.8			A110 Manage data/files L140 0.8 Document/File Management	C400 Third Party Communication	Create mail merge sheets for public prosecutors and for sellers	Nuria de la Fuente
3/6/24	0.6			A110 Manage data/files L140 0.6 Document/File Management	C400 Third Party Communication	Create CSV sheets for stamps.com mail merge	Nuria de la Fuente
3/6/24	0.4			A110 Manage data/files L140 0.4 Document/File Management	C400 Third Party Communication	Troubleshoot stamps.com mail merge	Nuria de la Fuente
3/6/24	0.4	100.00%		A110 Manage data/files L140 0 Document/File Management	C400 Third Party Communication	Manually accept variant address on stamps.com	Nuria de la Fuente

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
3/6/24	0.6	100.00%		A110 Manage data/files L140 0: Document/File Management	C400 Third Party Communication	Manually enter titles for mail merge per stamps.com glitch	Nuria de la Fuente
3/6/24	0.2	100.00%		A110 Manage data/files L140 0: Document/File Management	C400 Third Party Communication	Research how to address international mail for Etsy vendors	Nuria de la Fuente
3/6/24	0.4	100.00%		A110 Manage data/files L140 0: Document/File Management	C400 Third Party Communication	Troubleshoot international mail addressing on stamps.com	Nuria de la Fuente
3/6/24	2.5			A108 Communicate (other external) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Prepare settlement offer to Etsy (Tables 1 and 2, incorporate client edits); send back to client; figure fee tables and cost tables	Rachel Doughty
3/7/24	3.4	100.00%		A110 Manage data/files L140 0: Document/File Management	C400 Third Party Communication	Create separate mail merge sheet for international noticed parties and start creating word mail merge to send postage via usps office	Nuria de la Fuente
3/8/24	0.5			A102 Research L110 Fact Investigation/Development	L110 Fact Investigation/Development		Karishma Goswami
3/8/24	0.1			A106 Communicate (with client) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Text with client re settlement needs	Rachel Doughty
3/8/24	0.2			A108 Communicate (other external) P280 Other	P280 Other	Email correspondence w/ AG re certificate of merit	Rachel Doughty
3/8/24	0.2			A106 Communicate (with client) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Email correspondence w/ client	Rachel Doughty
3/8/24	0.3			A103 Draft/revise L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Prepare settlement offer to Etsy; confer w/ client re same	Rachel Doughty
3/11/24	0.1			A106 Communicate (with client) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Confer w/ client re settlement offer sent to Etsy	Rachel Doughty
3/12/24	0.5			A105 Communicate (in firm) L190 Other Case Assessment, Development and Administration	L190 Other Case Assessment, Development and Administration	Meeting with RL regarding notice letter, complaint, and work delegation	Rachel Doughty
3/12/24	0.2			A105 Communicate (in firm) L250 Other Written Motions and Submissions	C400 Third Party Communication	Prepare notice letter	Rachel Doughty
3/12/24	0.2	#####		0: A111 Other P280 Other	P280 Other	Tracking packages from Etsy	Rae Lovko

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
3/12/24	0.5			A105 Communicate (in firm) L190 Other Case Assessment, Development and Administration	L190 Other Case Assessment, Development and Administration	Meeting with RD regarding notice letter, complaint, and work delegation	Rae Lovko
3/12/24	0.2			A104 Review/analyze C400 Third Party Communication	C400 Third Party Communication	Review Supplemental Prop 65 Notice	Rae Lovko
3/12/24	1.4	#####	0	A111 Other P280 Other	P280 Other	Travel to post office to acquire Etsy-ordered products	Rae Lovko
3/12/24	4		4	A103 Draft/revise P280 Other	P280 Other	Edit 60-Day Notice; update files	Rae Lovko
3/13/24	0.4		0.4	A102 Research L110 Fact Investigation/Development	L110 Fact Investigation/Development	discovery timeline	Karishma Goswami
3/13/24	0.3		0.3	A104 Review/analyze P280 Other	P280 Other	Review and analyze no merit letter from AG	Rachel Doughty
3/13/24	0.2		0.2	A103 Draft/revise L250 Other Written Motions and Submissions	C400 Third Party Communication	Prepare new notice letter	Rachel Doughty
3/13/24	0.1		0.1	A105 Communicate (in firm) L120 Analysis/Strategy	L120 Analysis/Strategy	Discussion with RD regarding 60-Day Notice	Rae Lovko
3/13/24	2.7		2.7	A103 Draft/revise P280 Other	P280 Other	Edit of 60 Notice letter	Rae Lovko
3/13/24	0.2		0.2	A110 Manage data/files P280 Other	P280 Other	Ordered Parley product on Etsy	Rae Lovko
3/13/24	2		2	A101 Plan and prepare for P280 Other	P280 Other	Organize com support	Rae Lovko
3/14/24	0.1		0.1	A110 Manage data/files L140 Document/File Management	C400 Third Party Communication	Pull postage costs from stamps.com and send to administrative	Nuria de la Fuente
3/14/24	1.8		1.8	A110 Manage data/files L140 Document/File Management	C400 Third Party Communication	Edit and prepare service documents for printing	Nuria de la Fuente
3/14/24	0.1		0.1	A103 Draft/revise L250 Other Written Motions and Submissions	C400 Third Party Communication	Prepare 2nd notice letter	Rachel Doughty
3/14/24	1.3		1.3	A104 Review/analyze P280 Other	P280 Other	Review and finalize 60 day notice letter and com support	Rae Lovko

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
3/15/24	0.3		0.3		C400 Third Party Communication	Create exhibit dividers for com support	Nuria de la Fuente
3/15/24	0.4	#####	0	A108 Communicate (other external) L140 Document/File Management	C400 Third Party Communication	Call Adobe for help with combined document pages	Nuria de la Fuente
3/15/24	0.3		0.3	A110 Manage data/files L140 Document/File Management	C400 Third Party Communication	Serve Prop 65 notice and COM Support top AG thought the 60-day not portal	Nuria de la Fuente
3/15/24	0.2		0.2	A110 Manage data/files L140 Document/File Management	C400 Third Party Communication	Serve Prop 65 notice and POS to prosecutors	Nuria de la Fuente
3/15/24	0.2		0.2	A110 Manage data/files L140 Document/File Management	C400 Third Party Communication	Serve Prop 65 notice and POS to noticed parties	Nuria de la Fuente
3/15/24	0.7		0.7	A110 Manage data/files L140 Document/File Management	C400 Third Party Communication	Print postage for all parties to be served prop 65 supplemental notice	Nuria de la Fuente
3/15/24	0.6		0.6	A110 Manage data/files L140 Document/File Management	C400 Third Party Communication	Print all documents to serve for supplemental prop 65 notice	Nuria de la Fuente
3/15/24	0.7		0.7	A110 Manage data/files L140 Document/File Management	C400 Third Party Communication	Bookmark all exhibits and combine with index to serve the AG	Nuria de la Fuente
3/15/24	0.6		0.6	A110 Manage data/files L140 Document/File Management	C400 Third Party Communication	Sort prop 65 service list spreadsheet to create.csv docs or mail merge and certificate of service list	Nuria de la Fuente
3/15/24	0.2		0.2	A110 Manage data/files L140 Document/File Management	C400 Third Party Communication	Drop off all mail service of prop 65 supplemental at mail box	Nuria de la Fuente
3/15/24	0.3	#####	0	A110 Manage data/files L140 Document/File Management	C400 Third Party Communication	Troubleshoot stamps.com recipient fields for mailing	Nuria de la Fuente
3/15/24	2.1		2.1	A108 Communicate (other external) L140 Document/File Management	L140 Document/File Management	Stuff envelopes with supplementary comm support documents.	Karishma Goswami
3/18/24	0.2	#####	0	A110 Manage data/files L140 Document/File Management	C400 Third Party Communication	Calendar 60 days out from notice sent friday for amending complaint	Nuria de la Fuente
3/18/24	0.6	#####	0	A110 Manage data/files L140 Document/File Management	C400 Third Party Communication	Prepare all documents for filing new complaint in this matter	Nuria de la Fuente
3/18/24	0.2		0.2	A110 Manage data/files L140 Document/File Management	L210 Pleadings	Edit Complaint format and footer and save as pdf	Nuria de la Fuente
3/18/24	0.3	#####	0		L210 Pleadings	File Complaint and initial documents	Nuria de la Fuente

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
3/18/24	0.2			A110 Manage data/files L140 0  Document/File Management	L110 Fact Investigation/Development	Pass postage bill for sending slp's to lab to admin so the may be attributed to the matter	Nuria de la Fuente
3/18/24	0.1	#####	0	A105 Communicate (in firm) 0  L210 Pleadings	L210 Pleadings	Communicate in firm re deadline to file complaint	Rachel Doughty
3/18/24	0.1			A108 Communicate (other external) L210 Pleadings	L210 Pleadings	Email correspondence to opposing counsel seeking agreement to service of process by email	Rachel Doughty
3/18/24	2.3			A103 Draft/revise L210 Pleadings	L210 Pleadings	Draft complaint	Rae Lovko
3/19/24	0.2	#####	0	A110 Manage data/files L140 0  Document/File Management	L110 Fact Investigation/Development	E-file Misc. exhibit 1 to complaint and summons	Nuria de la Fuente
3/19/24	0.1			A110 Manage data/files L140 0  Document/File Management	L210 Pleadings	Updated dkt with filed stamped case initiation docs	Nuria de la Fuente
3/19/24	0.5			A110 Manage data/files L140 0  Document/File Management	L230 Court Mandated Conferences	Update Clio calendar per cmc	Nuria de la Fuente
3/19/24	0.4			A110 Manage data/files L140 0  Document/File Management	L140 Document/File Management	Create templates for new matter	Nuria de la Fuente
3/19/24	1.3	#####	0	A111 Other P280 Other	P280 Other	Travel to Hillside PO to obtain Etsy order	Rae Lovko
3/20/24	1			A103 Draft/revise L110 Fact 1  Investigation/Development	L110 Fact Investigation/Development	Discovery timeline, updating database	Karishma Goswami
3/20/24	0.2		0.2		L210 Pleadings	Confer in firm re summons and amended complaint	Rachel Doughty
3/20/24	0.2			A105 Communicate (in firm) 0  L250 Other Written Motions and Submissions	L210 Pleadings	Confer w/ co-counsel re refiling attachment to complaint and summons	Rachel Doughty
3/20/24	0.1			A105 Communicate (in firm) L110 Fact 0  Investigation/Development	L110 Fact Investigation/Development	Confer w/ assistant re photo management	Rachel Doughty
3/20/24	0.7	#####	0	A103 Draft/revise L210 Pleadings	L210 Pleadings	Revise summons, prepare exhibit cover sheet, file both	Rachel Doughty
3/20/24	0.1	#####	0		L210 Pleadings	Re-file summons	Rachel Doughty

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
3/20/24	0.2		0.2		L210 Pleadings	Confer in firm re summons and amended complaint	Rae Lovko
3/20/24	0.2		0.2	A105 Communicate (in firm) L250 Other Written Motions and Submissions	L210 Pleadings	Confer w/ co-counsel re refiling attachment to complaint and summons	Rae Lovko
3/20/24	0.1		0.1	A105 Communicate (in firm) L110 Fact Investigation/Development	L110 Fact Investigation/Development	Confer w/ assistant re photo management	Rae Lovko
3/22/24	0.4		0.4	A110 Manage data/files L140 Document/File Management	L210 Pleadings	Update service list sheet per unsuccessful usps service and successful e-services and save e-service confirmations to notice folder	Nuria de la Fuente
3/22/24	0.2		0.2	A110 Manage data/files L140 Document/File Management	L210 Pleadings	Update dkt per OneLegal returned docs of Initial papers	Nuria de la Fuente
3/22/24	0.3	#####	0	A110 Manage data/files L140 Document/File Management	L210 Pleadings	Prepare service of packet for Etsy with postage	Nuria de la Fuente
3/22/24	0.1		0.1	A105 Communicate (in firm) L120 Analysis/Strategy	L120 Analysis/Strategy	Prepare response to opposing counsel re case filing	Rachel Doughty
3/22/24	0.1		0.1	A105 Communicate (in firm) C200 Researching Law	C200 Researching Law	Discussing timing of 2016.090 demand	Rachel Doughty
3/22/24	1.1		1.1	A103 Draft/revise P280 Other	P280 Other	Letter to defendants	Rachel Doughty
3/22/24	2.2		2.2	A103 Draft/revise P280 Other	P280 Other	Draft email to OPC regarding AG letter and demand for initial disclosure; sent to RD	Rae Lovko
3/23/24	0.1	#####	0	A110 Manage data/files L140 Document/File Management	L210 Pleadings	Prepare Complaint to with AG's	Nuria de la Fuente
3/23/24	0.1		0.1	A105 Communicate (in firm) L140 Document/File Management	L210 Pleadings	Confer w/atty re. specs for filing complaint to AG	Nuria de la Fuente
3/23/24	0.1	#####	0	A110 Manage data/files P400 Initial Document Preparation/Filing	P400 Initial Document Preparation/Filing	File complaint w/ exhibit 1 to AG	Nuria de la Fuente
3/28/24	0.1		0.1	A104 Review/analyze L110 Fact Investigation/Development	L110 Fact Investigation/Development	Review lab results	Rae Lovko

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
4/4/24	0.2	#####	0	A108 Communicate (other external) L210 Pleadings	L210 Pleadings	Email correspondence w/ opposing counsel re deadline to file responsive pleading & update internal deadlines	Rachel Doughty
4/5/24	0.7		0.7	A110 Manage data/files L140 Document/File Management	L110 Fact Investigation/Development	Photograph Etsy SLP's w KG	Nuria de la Fuente
4/5/24	0.3		0.3	A110 Manage data/files L140 Document/File Management	L210 Pleadings	Update DKT per service email received orders	Nuria de la Fuente
4/5/24	0.7	#####	0	A110 Manage data/files L140 Document/File Management	L210 Pleadings	Prepare proof of service of process	Nuria de la Fuente
4/5/24	0.2		0.2	A110 Manage data/files L140 Document/File Management	L210 Pleadings	Update Clio w new judge info and update templates	Nuria de la Fuente
4/5/24	0.1	#####	0	A105 Communicate (in firm) L140 Document/File Management	L210 Pleadings	Confer w RD re. POS of summons	Nuria de la Fuente
4/5/24	0.6	#####	0	A110 Manage data/files P400 Initial Document Preparation/Filing	P400 Initial Document Preparation/Filing	Attempt to file POS of Summons, research other cases for file type selected to file	Nuria de la Fuente
4/5/24	0.3	#####	0	A110 Manage data/files L140 Document/File Management	L210 Pleadings	Create a POS of service of Non-complex notification and of judge reassignment for OC and e-serve	Nuria de la Fuente
4/5/24	0.1	#####	0	A110 Manage data/files L140 Document/File Management	L210 Pleadings	Save e-service of OC to Corr	Nuria de la Fuente
4/5/24	0.4	#####	0	A110 Manage data/files L140 Document/File Management	L140 Document/File Management	Updated templates	Nuria de la Fuente
4/5/24	0.3	#####	0	A110 Manage data/files L140 Document/File Management	L210 Pleadings	Calendar responsive pleadings to complaint and filing of POS of process for all attys	Nuria de la Fuente
4/5/24	0.1		0.1	A110 Manage data/files L140 Document/File Management	L210 Pleadings	Save to corr folder the email with OC consenting to e-service	Nuria de la Fuente
4/5/24	0.4		0.4	A102 Research L110 Fact Investigation/Development	L110 Fact Investigation/Development	discovery timeline. etsy product photos with nuria	Karishma Goswami
4/5/24	0.5		0.5	A102 Research L110 Fact Investigation/Development	L110 Fact Investigation/Development	product photos with ndlf	Karishma Goswami
4/5/24	1.5		1.5	A103 Draft/revise L140 Document/File Management	L140 Document/File Management	organizing product photos in etsy gdrive	Karishma Goswami
4/5/24	0.1	#####	0	A104 Review/analyze P280 Other	P280 Other	Review order re non-complex and instruct staff re service and calendaring same	Rachel Doughty

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
4/5/24	0.2		0.2	A105 Communicate (in firm) L210 Pleadings	L210 Pleadings	Assist paralegal with POS of process	Rachel Doughty
4/5/24	0.1		0.1	A104 Review/analyze L110 Fact Investigation/Development	L110 Fact Investigation/Development	Review facts research	Rachel Doughty
4/8/24	0.4	#####	0	A108 Communicate (other external) L140 Document/File Management	L210 Pleadings	Call OneLegal and inquire re. missing file type for filing a POS of Summons	Nuria de la Fuente
4/8/24	0.1	#####	0	A108 Communicate (other external) L140 Document/File Management	L210 Pleadings	Call docket clerk re. missing file type to title POS of summons on OneLegal and inquire re best opion to use	Nuria de la Fuente
4/9/24	0.2	#####	0	A108 Communicate (other external) P400 Initial Document Preparation/Filing	P400 Initial Document Preparation/Filing	Call One Legal again Re. File type to select to file POS of Summons	Nuria de la Fuente
4/9/24	0.2	#####	0	A108 Communicate (other external) P400 Initial Document Preparation/Filing	P400 Initial Document Preparation/Filing	Call clerk of Alameda sup court again re. what file type to select to file POS of summons	Nuria de la Fuente
4/9/24	0.3	#####	0	A110 Manage data/files P400 Initial Document Preparation/Filing	P400 Initial Document Preparation/Filing	File POS of summons on OneLegal using file type as advised by clerk and include a note in the filing explaining file type selected	Nuria de la Fuente
4/9/24	0.1	#####	0	A105 Communicate (in firm) L140 Document/File Management	L210 Pleadings	Verify that OC was served with recently filed case reassignment and notify atty	Nuria de la Fuente
4/10/24	0.1		0.1		L110 Fact Investigation/Development	Confer w atty Re. receipt for Legend slp testing	Nuria de la Fuente
4/10/24	1			A101 Plan and prepare for L110 Fact Investigation/Development	L110 Fact Investigation/Development	Verify location of slps that were identified by KG as missing products received photos by inspecting products in storage, and cross comparing evidence in products folders with Etsy Products spreadsheet	Nuria de la Fuente

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
4/10/24	2.7		2.7		C100 Fact Gathering	Emailed Carla to check on payments for legend lab. Checked drive for missing product photos. Uploaded thumbnail photos of products received to spreadsheet. Added thumbnail photos to the discovery timeline tab of the spreadsheet. Tracking down missing product photos.	Karishma Goswami
4/10/24	0.4		0.4	A101 Plan and prepare for L140 Document/File Management	L110 Fact Investigation/Development	Review of spreadsheet and received documents	Rae Lovko
4/11/24	0.3	#####	0	A105 Communicate (in firm) L190 Other Case Assessment, Development and Administration	L190 Other Case Assessment, Development and Administration	Discussion with RL re: outstanding tasks, initial disclosures, products	Rachel Doughty
4/11/24	0.3	#####	0	A105 Communicate (in firm) L190 Other Case Assessment, Development and Administration	L190 Other Case Assessment, Development and Administration	Discussion with RD re: outstanding tasks, initial disclosures, products	Rae Lovko
4/15/24	0.2	#####	0	A110 Manage data/files L140 Document/File Management	L210 Pleadings	Scan and save USPS received Not of Case reassignment	Nuria de la Fuente
4/15/24	0.1	#####	0	A110 Manage data/files L140 Document/File Management	L210 Pleadings	Check court for docket updates	Nuria de la Fuente
4/15/24	0.1	#####	0	A110 Manage data/files L140 Document/File Management	L210 Pleadings	Updated dkt per court endorsed POS of summons and complaint and notify attys	Nuria de la Fuente
4/16/24	0.2		0.2	A105 Communicate (in firm) L140 Document/File Management	L110 Fact Investigation/Development	Confer w atty re. streamlining slp processing protocol	Nuria de la Fuente
4/16/24	0.2	#####	0	A110 Manage data/files L140 Document/File Management	L210 Pleadings	Verify responsive pleadings have been calendared and respond to atty's email	Nuria de la Fuente
4/16/24	0.6	#####	0	A110 Manage data/files L140 Document/File Management	L310 Written Discovery	Work on preparing initial disclosure demand template	Nuria de la Fuente

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
4/16/24	0.3		0.3	A105 Communicate (in firm) L110 Fact Investigation/Development	L110 Fact Investigation/Development	Discussing product handling with assistant; directing associate to prepare initial disclosure demand	Rachel Doughty
4/17/24	0.4	#####	0	A103 Draft/revise L250 Other Written Motions and Submissions	L250 Other Written Motions and Submissions	Prepare letter to opposing counsel re procedure/tolling, etc.	Rachel Doughty
4/17/24	1.5		1.5	A103 Draft/revise P280 Other	P280 Other	Draft Demand for Initial Disclosures and accompanying letter to OPC regarding case management deadlines	Rae Lovko
4/18/24	1.1	#####	0	A103 Draft/revise P100 Project Administration.	P100 Project Administration	Prepare letter to Etsy counsel suggesting procedure going forward	Rachel Doughty
4/18/24	0.2	#####	0	A105 Communicate (in firm) P100 Project Administration	P100 Project Administration	Assign out discovery-related tasks	Rachel Doughty
4/18/24	0.5		0.5	A103 Draft/revise P280 Other	P280 Other	Edit draft letter to OPC	Rae Lovko
4/22/24	0.1	#####	0	A110 Manage data/files L140 Document/File Management	L210 Pleadings	Review court dkt for dkt updates per service email	Nuria de la Fuente
4/23/24	0.1	#####	0	A110 Manage data/files L140 Document/File Management	L210 Pleadings	Download and save dkt for Not of Hearing	Nuria de la Fuente
4/23/24	0.1	#####	0	A110 Manage data/files L140 Document/File Management	L210 Pleadings	Create a POS for e-service of Not of Hearing to OC	Nuria de la Fuente
4/23/24	0.1	#####	0	A110 Manage data/files L140 Document/File Management	L210 Pleadings	Serve OC w Not of Hearing	Nuria de la Fuente
4/23/24	0.1		0.1	A110 Manage data/files L140 Document/File Management	L210 Pleadings	Save email confirmation of service on OC in the corr folder	Nuria de la Fuente
4/23/24	1.1	#####	0	A103 Draft/revise L210 Pleadings	L210 Pleadings	Draft FAC	Rae Lovko
4/24/24	0.2		0.2	A104 Review/analyze P280 Other	P280 Other	Review materials in advance of meeting to discuss Etsy litigation with partner	Jessica Blome
4/24/24	0.2		0.2	A105 Communicate (in firm) L120 Analysis/Strategy	L120 Analysis/Strategy	Confer with partner re: Etsy strategy	Jessica Blome

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
4/24/24	0.3		0.3	A110 Manage data/files L140 0 Document/File Management	L230 Court Mandated Conferences	Calendar Initial CMC	Nuria de la Fuente
4/24/24	0.1		0.1	A108 Communicate (other external) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Email correspondence w/ opposing counsel re demurrer, settlement, setting up M&C	Rachel Doughty
4/24/24	0.1		0.1	A105 Communicate (in firm) L120 Analysis/Strategy	L120 Analysis/Strategy	Email correspondence w/ partner re settlement and demurrer in Etsy	Rachel Doughty
4/25/24	0.1		0.1	A105 Communicate (in firm) L250 Other Written Motions and Submissions	L310 Written Discovery	Meeting w/RSD re: drafting response to initial disclosure demands	Jessica San Luis
4/25/24	0.2		0.2		L250 Other Written Motions and Submissions	Prepare for meeting with Etsy attorneys	Rachel Doughty
4/25/24	0.4		0.4	A108 Communicate (other external) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Correspondence w/ opposing counsel re settlement & M&C for demurrer	Rachel Doughty
4/25/24	0.2		0.2	A103 Draft/revise L310 Written Discovery	L310 Written Discovery	Prepare initial disclosure responses	Rachel Doughty
4/25/24	0.1		0.1	A106 Communicate (with client) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Convey settlement offer of \$15k total to client	Rachel Doughty
4/25/24	0.1	#####	0	A102 Research C200 Researching Law	C200 Researching Law	Legal research re statute of limitations	Rachel Doughty
4/25/24	0.3	#####	0	A102 Research C200 Researching Law	C200 Researching Law	Legal research re SOL and write memo re same	Rachel Doughty
4/25/24	0.2	#####	0	A102 Research C200 Researching Law	C200 Researching Law	Review dismissal law	Rachel Doughty
4/25/24	0.2		0.2	A102 Research C200 Researching Law	C200 Researching Law	Research re Cal Health & Saf Code § 25249.7(h)	Rachel Doughty
4/25/24	0.2		0.2	A106 Communicate (with client) L120 Analysis/Strategy	L120 Analysis/Strategy	Email correspondence w/ client re demurrer	Rachel Doughty
4/25/24	0.2	#####	0	A103 Draft/revise L210 Pleadings	L210 Pleadings	Work with staff to create, file, and serve DWOP	Rae Lovko
4/26/24	0.3	#####	0	A103 Draft/revise L140 Document/File Management	L210 Pleadings	Draft dismissal for filing	Jessica San Luis
4/26/24	0.6		0.6	A103 Draft/revise L320 Document Production	L320 Document Production	Finalizing documents for filing Filing with court, e-service	Jessica San Luis
4/26/24	0.4	#####	0	A110 Manage data/files L140 Document/File Management	L210 Pleadings	Prepare request for dismissal and POS to be filed ad served POS w/JSL	Nuria de la Fuente
4/26/24	0.4	#####	0	A110 Manage data/files L140 Document/File Management	L210 Pleadings	File and serve dismissal w/JSL	Nuria de la Fuente

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
4/26/24	0.2	#####	0	A105 Communicate (in firm) L210 Pleadings	L210 Pleadings	Confer w/ staff re dismissal	Rachel Doughty
4/26/24	0.1		0.1	A108 Communicate (other external) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Email correspondence w/ opposing counsel re settlement	Rachel Doughty
4/26/24	1		1	A103 Draft/revise L210 Pleadings	L210 Pleadings	Draft complaint	Rae Lovko
4/26/24	0.4		0.4	A105 Communicate (in firm) L210 Pleadings	L210 Pleadings	Discussion with RD re complaint	Rae Lovko
4/29/24	0.1		0.1	A110 Manage data/files L140 Document/File Management	L210 Pleadings	Check court dockets and verify dkt is up to date w NDLF	Jessica San Luis
4/29/24	0.1		0.1	A110 Manage data/files L140 Document/File Management	L210 Pleadings	Check court dockets and verify dkt is up to date w JSL	Nuria de la Fuente
4/29/24	0.1		0.1	A110 Manage data/files L140 Document/File Management	C400 Third Party Communication	Save 60-Day Notice AG (case) No. 2024-01113 to matter's notes	Nuria de la Fuente
4/29/24	0.3		0.3	A105 Communicate (in firm) P100 Project Administration	P100 Project Administration	Check deadlines and discuss same with staff	Rachel Doughty
4/29/24	0.2		0.2	A106 Communicate (with client) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Call with client--they're rejecting settlement offer \$15k	Rachel Doughty
4/29/24	1.5		1.5	A103 Draft/revise L210 Pleadings	L210 Pleadings	Finish complaint and CCC	Rae Lovko
4/30/24	0.2	#####	0	A111 Other P280 Other	P280 Other	Updating docket, checking for undocketed items	Jessica San Luis
5/2/24	0.2	#####	0	A110 Manage data/files L140 Document/File Management	L110 Fact Investigation/Development	Updating files, billing entries	Jessica San Luis
5/3/24	0.8		0.8		L110 Fact Investigation/Development	Etsy discovery timeline	Karishma Goswami
5/10/24	0.3		0.3	A103 Draft/revise L140 Document/File Management	L110 Fact Investigation/Development	Update docket and file	Jessica San Luis
5/14/24	0.3		0.3	A110 Manage data/files L140 Document/File Management	L110 Fact Investigation/Development	Update contacts, file	Jessica San Luis
5/14/24	0.1		0.1	A108 Communicate (other external) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Reject settlement offer	Rachel Doughty
5/24/24	0.1		0.1	A107 Communicate (other outside counsel) L140 Document/File Management	L210 Pleadings	Email to counsel for Etsy re: service of process	Jessica San Luis
5/29/24	0.6		0.6	A110 Manage data/files P280 Other	P280 Other	Check product listings	Jessica San Luis
5/29/24	0.1		0.1	A110 Manage data/files L140 Document/File Management	L210 Pleadings	Check court docket for updates	Nuria de la Fuente

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
5/29/24	0.8			A101 Plan and prepare for L190 Other Case Assessment, Development and Administration	L190 Other Case Assessment, Development and Administration	Purchase and screenshot purchase process of Noor Gold, Shivanya, Parley SLPs, combine into pdf and save in product folder.	Nuria de la Fuente
5/29/24	0.7			A101 Plan and prepare for L190 Other Case Assessment, Development and Administration	L190 Other Case Assessment, Development and Administration	Fill in Purchase tab in Etsy products spreadsheet and create duplicates and folders containing the purchase process for each sample of Noor Gold, Shivanya, and Parley slp	Nuria de la Fuente
5/29/24	0.4			A101 Plan and prepare for L190 Other Case Assessment, Development and Administration	L190 Other Case Assessment, Development and Administration	Update Discovery timeline tab in Etsy Products spreadsheet with link, storefront name etc. for slp Noor Gold, Shyvanya and Parley SLPs	Nuria de la Fuente
5/29/24	0.3			A101 Plan and prepare for L190 Other Case Assessment, Development and Administration	L190 Other Case Assessment, Development and Administration	Save a copy of the receipt to all etsy receipts folder for the purchase of Noor Gold, Shivanya and Parley	Nuria de la Fuente
5/29/24	0.7			A105 Communicate (in firm) L110 Fact Investigation/Development	L110 Fact Investigation/Development	Looking for creams and public health warnings with staff	Rachel Doughty
5/29/24	0.5			A103 Draft/revise L210 Pleadings	L210 Pleadings	Review and revise complaint	Rachel Doughty
5/30/24	0.3			A101 Plan and prepare for L190 Other Case Assessment, Development and Administration	L190 Other Case Assessment, Development and Administration	Fill in Purchase tab in Etsy products spreadsheet and create duplicates and folders containing the purchase process for each sample of Jhalak slp	Nuria de la Fuente
5/30/24	0.1			A101 Plan and prepare for L190 Other Case Assessment, Development and Administration	L190 Other Case Assessment, Development and Administration	Save a copy of the receipt to all etsy receipts folder for the purchase of Jhalak	Nuria de la Fuente
5/30/24	0.2			A101 Plan and prepare for L190 Other Case Assessment, Development and Administration	L190 Other Case Assessment, Development and Administration	Update Discovery timeline tab in Etsy Products spreadsheet with link, storefront name etc. for slp Jhalak	Nuria de la Fuente
5/30/24	0.3			A101 Plan and prepare for L190 Other Case Assessment, Development and Administration	L190 Other Case Assessment, Development and Administration	Purchase and screenshot purchase process of Teryak slp, combine into pdf and save in product folder.	Nuria de la Fuente

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
5/30/24	0.3			A101 Plan and prepare for L190 Other Case Assessment, Development and Administration	L190 Other Case Assessment, Development and Administration	Fill in Purchase tab in Etsy products spreadsheet and create duplicates and folders containing the purchase process for each sample of Teryak slp	Nuria de la Fuente
5/30/24	0.1		0.1	A101 Plan and prepare for L190 Other Case Assessment, Development and Administration	L190 Other Case Assessment, Development and Administration	Save a copy of the receipt to all etsy receipts folder for the purchase of Teryak	Nuria de la Fuente
5/30/24	0.1		0.1	A101 Plan and prepare for L190 Other Case Assessment, Development and Administration	L190 Other Case Assessment, Development and Administration	Add a thumbnail photo of each sample of Jhalak slp purchased to the Discovery timeline and the purchased tabs in the Etsy Products spreadsheet	Nuria de la Fuente
5/30/24	0.1		0.1	A101 Plan and prepare for L190 Other Case Assessment, Development and Administration	L190 Other Case Assessment, Development and Administration	Add a thumbnail photo of each sample of Teryak slps purchased to the Discovery timeline and the purchased tabs in the Etsy Products spreadsheet	Nuria de la Fuente
5/30/24	2.6		2.6	A101 Plan and prepare for L190 Other Case Assessment, Development and Administration	L190 Other Case Assessment, Development and Administration	Continue Performing Discovery Timeline, save screenshots to pdf and file in each corresponding folder. Scroll through all pages of each products search to confirm product discovery timeline	Nuria de la Fuente
5/30/24	0.3		0.3	A101 Plan and prepare for L190 Other Case Assessment, Development and Administration	L190 Other Case Assessment, Development and Administration	Fill in Purchase tab in Etsy products spreadsheet and create duplicates and folders containing the purchase process for each sample of Jhalak SLP	Nuria de la Fuente
5/30/24	0.2		0.2	A103 Draft/revise L210 Pleadings	L210 Pleadings	Prepare complaint--discuss w/ co-counsel	Rachel Doughty
5/30/24	1		1	A103 Draft/revise L210 Pleadings	L210 Pleadings	Edit to complaint after discussion with RD	Rae Lovko
5/31/24	0.3		0.3	A105 Communicate (in firm) L120 Analysis/Strategy	L120 Analysis/Strategy	Discussion re: discovery tracking and database	Jessica San Luis

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
5/31/24	1.5			A110 Manage data/files L140 1.5 Document/File Management	L110 Fact Investigation/Development	Create a Beautywell folder under test results and save all as pdf the Public notice info found on the webpage including test results for each of the products listed and search for those products on etsy	Nuria de la Fuente
5/31/24	0.8			A101 Plan and prepare for L190 Other Case Assessment, Development and Administration 0.8 Administration	L190 Other Case Assessment, Development and Administration	Purchase Parley Golden Advanced Beauty Cream Pearl Shine with screen shots, enter into purchases and discovery tabs w images and create folder for product	Nuria de la Fuente
5/31/24	1.7			A101 Plan and prepare for L190 Other Case Assessment, Development and Administration 1.7 Administration	L190 Other Case Assessment, Development and Administration	Continue adding The Beutywell's SLPs with high mercury content to the discovery timeline and include thumbnail images	Nuria de la Fuente
5/31/24	0.6		0.6		L110 Fact Investigation/Development	Add public notices form Amazon II to to Etsy folder and add other notices found on line	Nuria de la Fuente
5/31/24	0.4			A101 Plan and prepare for L190 Other Case Assessment, Development and Administration 0.4 Administration	L190 Other Case Assessment, Development and Administration	Continue downloading and saving pdfs from The Beautywell's web page . This includes the web page for each of the slp w high Hg content test results for each of these	Nuria de la Fuente
5/31/24	0.2			A105 Communicate (in firm) L110 Fact Investigation/Development 0.2	L110 Fact Investigation/Development	Confer w/ staff re test results and website search	Rachel Doughty
5/31/24	0.1		0.1	A108 Communicate (other external) L110 Fact Investigation/Development	L110 Fact Investigation/Development	Email correspondence w/ Beautywell seeking test results	Rachel Doughty
5/31/24	0.5			A103 Draft/revise L210 0.5 Pleadings	L210 Pleadings	Edit complaint	Rae Lovko
6/3/24	0.3			A103 Draft/revise L140 0.3 Document/File Management	L210 Pleadings	Revise Notice of Related Cases	Jessica San Luis

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
6/3/24	0.4			A110 Manage data/files L140 0.4 Document/File Management	L210 Pleadings	Prepare CCC, Summons on Complaint and ADR Packet	Nuria de la Fuente
6/3/24	0.1			A105 Communicate (in firm) L140 Document/File Management	L210 Pleadings	Email Paralegal and atty to notify of initial filing packet completion	Nuria de la Fuente
6/3/24	0.1			A110 Manage data/files L140 0.1 Document/File Management	L210 Pleadings	Check court for docket updates	Nuria de la Fuente
6/3/24	0.3			A110 Manage data/files L140 0.3 Document/File Management	L210 Pleadings	Prepare Not of Related Cases and sent to paralegal and atty for review	Nuria de la Fuente
6/3/24	0.2			A101 Plan and prepare for L140 0.2 Document/File Management	L210 Pleadings	Prepare a draft of the POS of Summons for use after complaint is filed	Nuria de la Fuente
6/3/24	0.1			A102 Research C200 0.1 Researching Law	C200 Researching Law	Related case for dismissed case-- confirm notice of related case req'd	Rachel Doughty
6/3/24	0.3			A103 Draft/revise L210 0.3 Pleadings	L210 Pleadings	Prepare 17200 portion of complaint	Rachel Doughty
6/4/24	0.2			A105 Communicate (in firm) 0.2 C300 Analysis and Advice	C300 Analysis and Advice	Exchange emails with RL to answer questions about standing allegations in complaint for UCL claim	Jessica Blorne
6/4/24	0.1			A105 Communicate (in firm) 0.1 L210 Pleadings	L210 Pleadings	Discussion with RD regarding complaint	Rae Lovko
6/4/24	0.2			A105 Communicate (in firm) 0.2 L210 Pleadings	L210 Pleadings	Discussion with JB re 17200 standing	Rae Lovko
6/5/24	0.2			A103 Draft/revise L140 0.2 Document/File Management	L210 Pleadings	Edit Notice of Related Cases	Jessica San Luis
6/5/24	0.2			A110 Manage data/files L140 0.2 Document/File Management	L210 Pleadings	Confer w Paralegal re. Not of Related Case POS and update draft of the same	Nuria de la Fuente
6/6/24	0.5			A103 Draft/revise L210 0.5 Pleadings	L210 Pleadings	Prepare complaint	Rachel Doughty
6/6/24	4			A103 Draft/revise L210 4 Pleadings	L210 Pleadings	Edit complaint	Rae Lovko
6/7/24	0.5			A110 Manage data/files L140 0.5 Document/File Management	L210 Pleadings	Setting deadlines for service, CMC hearing and statement	Jessica San Luis
6/7/24	0.2			A110 Manage data/files L140 0.2 Document/File Management	L210 Pleadings	Perform final formatting edits to complaint	Nuria de la Fuente
6/7/24	0.2			A110 Manage data/files L140 0.2 Document/File Management	L210 Pleadings	Attach exhibits with exhibit covers to complaint and bookmark	Nuria de la Fuente

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
6/7/24	0.2			A110 Manage data/files L140 0.2 Document/File Management	L210 Pleadings	File complaint and Civil Case Cover sheet and save as filed copy to the docket	Nuria de la Fuente
6/7/24	0.1			A110 Manage data/files L140 0.1 Document/File Management	L210 Pleadings	Organize drafts folders for complaint, summons and not of related cases	Nuria de la Fuente
6/7/24	0.1			A110 Manage data/files L140 0.1 Document/File Management	L210 Pleadings	Add new case number to draft of Summons and Not of Related Cases	Nuria de la Fuente
6/7/24	0.3			A110 Manage data/files P400 Initial Document 0.3 Preparation/Filing	P400 Initial Document Preparation/Filing	Troubleshoot OneLegal and file summons on complaint and save as filed doc to dkt	Nuria de la Fuente
6/7/24	0.3			A103 Draft/revise L210 0.3 Pleadings	L210 Pleadings	Edit complaint; communicate with staff re filing and service	Rae Lovko
6/7/24	0.9			A102 Research P280 Other 0.9	P280 Other	Research of potential products for mercury content	Rae Lovko
6/11/24	1.1			A110 Manage data/files L140 1.1 Document/File Management	L210 Pleadings	Set deadlines and tasks; review docket; prepare Notice of Related Cases for filing	Jessica San Luis
6/11/24	0.2			A105 Communicate (in firm) 0.2 P280 Other	P280 Other	Research assigned judge	Rachel Doughty
6/11/24	0.1			A102 Research P280 Other 0.1	P280 Other	Research judge assigned to determine 170.6	Rachel Doughty
6/11/24	0.1			A106 Communicate (with client) L120 Analysis/Strategy 0.1	L120 Analysis/Strategy	Confer with client re potential to 170.6 judge	Rachel Doughty
6/11/24	0.1			A108 Communicate (other external) L210 Pleadings 0.1	L210 Pleadings	Email correspondence w/ opposing counsel and then staff about lack of service of complaint	Rachel Doughty
6/11/24	0.2			A103 Draft/revise L210 0.2 Pleadings	L210 Pleadings	Prepare service folder	Rachel Doughty
6/11/24	0.1			A105 Communicate (in firm) 0.1 L310 Written Discovery	L310 Written Discovery	Discuss initial disclosure demand	Rachel Doughty
6/11/24	0.1			A105 Communicate (in firm) 0.1 L310 Written Discovery	L310 Written Discovery	Discuss initial disclosure demand	Rae Lovko
6/12/24	0.6			A110 Manage data/files L140 0.6 Document/File Management	L210 Pleadings	Update docket, file; calendar deadlines for service and response; file proof of service with court	Jessica San Luis

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
6/13/24	0.2		0.2	A104 Review/analyze L390 0.2 Other Discovery	L390 Other Discovery	Strategize regarding discovery plan	Rae Lovko
6/14/24	0.3	#####	0	A110 Manage data/files L140 0 Document/File Management	L210 Pleadings	Re-file proof of service of initial complaint package	Jessica San Luis
6/14/24	0.2		0.2	A110 Manage data/files L140 0 Document/File Management	L210 Pleadings	Check and update docket, file	Jessica San Luis
6/14/24	0.1		0.1	A105 Communicate (in firm) L310 Written Discovery	L310 Written Discovery	Communication re initial disclosures	Rae Lovko
6/17/24	0.2		0.2	A110 Manage data/files L140 0.2 Document/File Management	L210 Pleadings	Update file, billing for court filing fees	Jessica San Luis
6/17/24	0.7		0.7	A103 Draft/revise L140 0.7 Document/File Management	L250 Other Written Motions and Submissions	Draft 170.6 motion for review	Jessica San Luis
6/17/24	0.4		0.4	A110 Manage data/files L140 0.4 Document/File Management	L210 Pleadings	Update dkt with court endorsed Notice of Related Case filing and review initial filing documents	Nuria de la Fuente
6/17/24	0.4		0.4	A105 Communicate (in firm) L140 Document/File Management	L210 Pleadings	Confer w paralegal and atty re. POS of Summons and research codes of civil procedure. Email lead atty re questions	Nuria de la Fuente
6/17/24	0.1		0.1	A105 Communicate (in firm) L210 Pleadings	L210 Pleadings	Discussing via email and phone issue of proper form for service of process	Rachel Doughty
6/18/24	0.5		0.5	A110 Manage data/files L140 0.5 Document/File Management	L210 Pleadings	Check docket, update tasks and deadlines; discussion re: proof of service	Jessica San Luis
6/18/24	0.4		0.4	A103 Draft/revise L140 0.4 Document/File Management	L210 Pleadings	Draft amended summons, discussion re: filing	Jessica San Luis
6/18/24	0.2		0.2	A103 Draft/revise L140 0.2 Document/File Management	L250 Other Written Motions and Submissions	Edits to 170.6 motion, discussion re: timing of filing	Jessica San Luis
6/18/24	0.7		0.7	A105 Communicate (in firm) L140 Document/File Management	L210 Pleadings	Confer w attys and paralegal to figure out logistics for filing summons and POS of Summons	Nuria de la Fuente
6/18/24	0.3		0.3	A110 Manage data/files L140 0.3 Document/File Management	L210 Pleadings	Serve Initial filing packet to OC	Nuria de la Fuente
6/18/24	0.1		0.1	A110 Manage data/files L140 0.1 Document/File Management	L210 Pleadings	Confer w atty re. review of POS of Summons before filing	Nuria de la Fuente
6/18/24	0.2		0.2	A110 Manage data/files L140 0.2 Document/File Management	L210 Pleadings	File POS of Summons and serve on OC	Nuria de la Fuente
6/18/24	0.2		0.2	A110 Manage data/files L140 0.2 Document/File Management	L210 Pleadings	Confer with attys re. using handbooks and atty sign off protocol to follow	Nuria de la Fuente

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
6/18/24	0.2			A110 Manage data/files L140 0.2 Document/File Management	L210 Pleadings	Update calendaring defendants responsive pleadings citing to CCPs and adding extension of time per service by email	Nuria de la Fuente
6/18/24	0.6			A110 Manage data/files L140 0.6 Document/File Management	L210 Pleadings	Update matter's templates for Caption page, POS and Stipulation to reflect change in counsel for Etsy and assigned judge	Nuria de la Fuente
6/18/24	0.1			A110 Manage data/files L140 0.1 Document/File Management	L210 Pleadings	Update matter's dashboard to reflect assigned judge	Nuria de la Fuente
6/18/24	0.3			A102 Research C200 0.3 Researching Law	C200 Researching Law	Look up time CRC Pre. responsive pleadings based on date of service and extension rules and for service via email	Nuria de la Fuente
6/18/24	0.3			A110 Manage data/files L140 0.3 Document/File Management	L210 Pleadings	Save filed docs to docket and corr and organize service folder for todays service	Nuria de la Fuente
6/18/24	0.1			A105 Communicate (in firm) L140 Document/File Management	L210 Pleadings	Confer w JSL re. saving e-service confirmations to corr and service folders	Nuria de la Fuente
6/18/24	0.1			A110 Manage data/files L140 0.1 Document/File Management	L210 Pleadings	Check courts docket for updates	Nuria de la Fuente
6/20/24	1	#####	0	A105 Communicate (in firm) L110 Fact Investigation/Development	L110 Fact Investigation/Development	Meeting / training with Nuria on discovery timeline	Grace Wainscoat
6/20/24	2.5			A102 Research L110 Fact 2.5 Investigation/Development	L110 Fact Investigation/Development	Discovery Timeline research	Grace Wainscoat
6/20/24	0.5			A103 Draft/revise L140 0.5 Document/File Management	L250 Other Written Motions and Submissions	Edit 170.6 motion, draft proof of service; review local rules	Jessica San Luis
6/20/24	0.1			A110 Manage data/files L140 0.1 Document/File Management	L110 Fact Investigation/Development	Confer w LR re. intern to help with Discovery timeline	Nuria de la Fuente
6/20/24	0.3			A101 Plan and prepare for C100 0.3 Fact Gathering	C100 Fact Gathering	Prepare training documents to train JL intern on performing discovery timeline	Nuria de la Fuente
6/20/24	1.4			A101 Plan and prepare for C100 1.4 Fact Gathering	C100 Fact Gathering	Start updating the Investigation Protocol sheet with specific instructions including links to spreadsheets and folders	Nuria de la Fuente
6/20/24	0.1			A105 Communicate (in firm) L250 Other Written Motions and Submissions	L250 Other Written Motions and Submissions	Review and approve peremptory challenge motion	Rachel Doughty

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
6/21/24	2.4		2.4	A102 Research L110 Fact Investigation/Development	L110 Fact Investigation/Development	Updating discovery timeline for Etsy products and research	Grace Wainscoat
6/21/24	3.1	#####	0	A101 Plan and prepare for C100 Fact Gathering	C100 Fact Gathering	Finish update Investigation Protocol sheet with specific instructions	Nuria de la Fuente
6/21/24	0.4		0.4	A105 Communicate (in firm) L110 Fact Investigation/Development	L110 Fact Investigation/Development	Confer with GW re. Discovery timeline investigation performed yesterday and discuss logistics of fact gathering	Nuria de la Fuente
6/21/24	0.6		0.6	A101 Plan and prepare for C100 Fact Gathering	C100 Fact Gathering	Save GFL's SLP test result received from LTS inc. to the corresponding product folders and the test results folder	Nuria de la Fuente
6/21/24	0.6		0.6	A101 Plan and prepare for C100 Fact Gathering	C100 Fact Gathering	Add GFLs (6) test results received from LTS to the test results tab and fill out all other required info in the spread sheet, including thumb nails pics	Nuria de la Fuente
6/21/24	0.9		0.9	A101 Plan and prepare for C100 Fact Gathering	C100 Fact Gathering	Add GFLs (19) test results from Beautywell to the test results tab and fill out all other required info in the spread sheet, including thumb nails pics	Nuria de la Fuente
6/21/24	0.5		0.5	A101 Plan and prepare for L440 Other Trial Preparation and Support	L440 Other Trial Preparation and Support	Task self GW re adding test results to spreadsheet, task myself to reach out to Amira of Beautywell and to cross reference test result work order numbers	Nuria de la Fuente
6/21/24	0.1		0.1	A105 Communicate (in firm) L110 Fact Investigation/Development	L110 Fact Investigation/Development	Confer w/ staff re test results	Rachel Doughty
6/24/24	1.3		1.3	A111 Other C100 Fact Gathering	C100 Fact Gathering	photographing etsy cream products	Grace Wainscoat
6/24/24	2.7		2.7	A110 Manage data/files L140 Document/File Management	L110 Fact Investigation/Development	Inputting test results from Amazon to Etsy	Grace Wainscoat
6/24/24	1.1		1.1	A101 Plan and prepare for L440 Other Trial Preparation and Support	L440 Other Trial Preparation and Support	Photograph SLPs received from Etsy	Nuria de la Fuente

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
6/24/24	0.2		0.2	A105 Communicate (in firm) L440 Other Trial Preparation and Support	L440 Other Trial Preparation and Support	Confer w GW re. task to enter test results from Amazon II in to Etsy spreadsheet	Nuria de la Fuente
6/24/24	0.2	#####	0	A101 Plan and prepare for L440 Other Trial Preparation and Support	L440 Other Trial Preparation and Support	Go to store and buy zip lock bags for Etsy SLP received photoshoot	Nuria de la Fuente
6/24/24	0.1		0.1	A110 Manage data/files L140 Document/File Management	L210 Pleadings	Check court docket for updates	Nuria de la Fuente
6/25/24	2.2		2.2	A110 Manage data/files L140 Document/File Management	L110 Fact Investigation/Development	Entering test results into Etsy spreadsheet	Grace Wainscoat
6/25/24	0.1		0.1	A105 Communicate (in firm) L140 Document/File Management	L140 Document/File Management	Confer w/ GW re. entering test results from health notices into Etsy sheet	Nuria de la Fuente
6/25/24	0.2		0.2	A105 Communicate (in firm) L140 Document/File Management	L140 Document/File Management	Confer w/ GW re. entering links to test results and public health notices into Etsy sheet	Nuria de la Fuente
6/25/24	0.5		0.5	A101 Plan and prepare for L440 Other Trial Preparation and Support	L440 Other Trial Preparation and Support	Download the photos of the products received to google photos. Go through photos and save to corresponding folder.	Nuria de la Fuente
6/25/24	0.7		0.7	A101 Plan and prepare for L440 Other Trial Preparation and Support	L440 Other Trial Preparation and Support	Convert jpgs of all products received photos into pdfs and bookmark with GIL pages and package page.	Nuria de la Fuente
6/26/24	1.8		1.8	A110 Manage data/files L140 Document/File Management	L110 Fact Investigation/Development	Etsy cream - entering testing results sources	Grace Wainscoat
6/27/24	2		2	A110 Manage data/files L140 Document/File Management	L110 Fact Investigation/Development	Etsy cream test result data organization and source locating	Grace Wainscoat
6/27/24	0.4		0.4	A105 Communicate (in firm) L120 Analysis/Strategy	L120 Analysis/Strategy	Meeting with Nuria re Etsy cream test results project	Grace Wainscoat
6/27/24	0.1		0.1	A105 Communicate (in firm) L140 Document/File Management	L140 Document/File Management	Review GW email re. test results entered in Etsy spreadsheet.	Nuria de la Fuente
6/27/24	0.4		0.4	A105 Communicate (in firm) L140 Document/File Management	L140 Document/File Management	Confer GW re. test results entered in Etsy spreadsheet and following steps to get all public health notices linked in test result sheet tab and confirming all health warning products are in the discovery timeline	Nuria de la Fuente

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
6/27/24	0.1	#####	0	A101 Plan and prepare for L440 Other Trial Preparation and Support	L440 Other Trial Preparation and Support	Create reoccurring calendar event to perform Etsy Discovery timeline every 3 wks for self and GW	Nuria de la Fuente
6/27/24	0.3		0.3	A105 Communicate (in firm) L140 Document/File Management	L140 Document/File Management	Send JSL the receipts for Etsy SLPs purchases made w my personal cc and request a refund	Nuria de la Fuente
6/27/24	0.7		0.7	A110 Manage data/files L140 Document/File Management	L140 Document/File Management	Download and save to appropriate folders the and email purchase and delivery confirmations of all Etsy SLP purchased	Nuria de la Fuente
6/27/24	0.1		0.1	A110 Manage data/files L140 Document/File Management	L140 Document/File Management	Check courts for docket updates	Nuria de la Fuente
6/27/24	0.6		0.6	A108 Communicate (other external) L440 Other Trial Preparation and Support	L440 Other Trial Preparation and Support	Draft and send email to Amira of Beautywell re. sharing additional tested slp documents as trial evidence	Nuria de la Fuente
6/28/24	3.4		3.4	A110 Manage data/files L140 Document/File Management	L110 Fact Investigation/Development	Etsy test results and discovery timeline updates and research	Grace Wainscoat
6/28/24	0.6		0.6	A101 Plan and prepare for L440 Other Trial Preparation and Support	L440 Other Trial Preparation and Support	Convert HEIC format photos of checkout process and products received to pdf, combine each into single pdfs and organize folder for Parley SLP	Nuria de la Fuente
7/1/24	0.6		0.6	A110 Manage data/files L140 Document/File Management	L110 Fact Investigation/Development	Etsy test results investigation and organization	Grace Wainscoat
7/1/24	1.1	#####	0	A105 Communicate (in firm) L140 Document/File Management	P280 Other	Meeting with Nuria re Etsy spreadsheet organization and updating; assigning new Etsy tasks	Grace Wainscoat
7/1/24	0.9	#####	0	A105 Communicate (in firm) L140 Document/File Management	L140 Document/File Management	Confer w GW Re. lab result entries and links to each lab result. Search for MN test results in drive. Plan following steps and create tasks for completing Etsy products sheets	Nuria de la Fuente
7/1/24	0.4	#####	0	A101 Plan and prepare for L440 Other Trial Preparation and Support	L440 Other Trial Preparation and Support	Drive to Ikea and buy bins to organize Etsy SPLs	Nuria de la Fuente

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
7/2/24	2.1		2.1	A101 Plan and prepare for L440 Other Trial Preparation and Support	L440 Other Trial Preparation and Support	Take inventory of Etsy purchased SLPs w NdlF and update Etsy product sheets with any missing info. Also add tracking numbers and GIL numbers to the sheet. Compare and verify product info on sheet with checkout process photos in folders	Grace Wainscoat
7/2/24	2.1		2.1	A101 Plan and prepare for L440 Other Trial Preparation and Support	L440 Other Trial Preparation and Support	Take inventory of Etsy purchased SLPs w GW and updated Etsy product sheets with any missing info. Also add tracking numbers and GIL numbers to sheet. Compare and verify product info on sheet with checkout process photos in each product's folder	Nuria de la Fuente
7/2/24	0.2		0.2	A101 Plan and prepare for L440 Other Trial Preparation and Support	L440 Other Trial Preparation and Support	Create tasks for self and GW to do follow up data entry in Etsy sheet	Nuria de la Fuente
7/2/24	0.1	#####	0.1	A101 Plan and prepare for L140 Other Document/File Management	L140 Document/File Management	Extend task deadlines for GW and myself per holiday	Nuria de la Fuente
7/2/24	0.1		0.1	A101 Plan and prepare for L140 Other Document/File Management	L140 Document/File Management	Review Etsy products sheet to generate follow up tasks	Nuria de la Fuente
7/3/24	1.1		1.1	A110 Manage data/files L190 Other Case Assessment, Development and Administration	L190 Other Case Assessment, Development and Administration	Managing/updating Etsy test results add; adding in test results from Bezos Ltr, adding missing pictures of products, verifying accuracy of FDA results	Grace Wainscoat
7/3/24	1.1		1.1	A101 Plan and prepare for L440 Other Trial Preparation and Support	L440 Other Trial Preparation and Support	Managing/updating Etsy test results add; adding in test results from Bezos Ltr, and gettign additional results from citations on letter, adding missing pictures of products, verifying FDA results	Nuria de la Fuente
7/3/24	0.2		0.2	A105 Communicate (in firm) L140 Document/File Management	L140 Document/File Management	Confer w GW re. data entry of test results into master spreadsheet	Nuria de la Fuente

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
7/8/24	0.5		0.5	A105 Communicate (in firm) L140 Document/File Management	L110 Fact Investigation/Development	Etsy test results communications/emails, data organization	Grace Wainscoat
7/8/24	0.2		0.2	A105 Communicate (in firm) L140 Document/File Management	L110 Fact Investigation/Development	Etsy test results communications/emails, data organization w GW	Grace Wainscoat
7/8/24	1		1	A101 Plan and prepare for L440 Other Trial Preparation and Support	L440 Other Trial Preparation and Support	Finish completing Etsy slp inventory & assigning locations on spread sheet	Nuria de la Fuente
7/8/24	0.4		0.4	A108 Communicate (other external) L140 Document/File Management	L140 Document/File Management	Email project manager at LTS Lab and inquire re. product packaging not returned to our office and include images and sample instructions to help with identification	Nuria de la Fuente
7/8/24	0.2		0.2	A105 Communicate (in firm) L140 Document/File Management	L140 Document/File Management	Follow up with LTS lab re. possibly swapped samples and update database notes to reflect this	Nuria de la Fuente
7/8/24	0.2		0.2	A105 Communicate (in firm) L140 Document/File Management	L140 Document/File Management	Review discovery timeline products, adding comments & questions re. removing certain SLPs etc	Nuria de la Fuente
7/9/24	1.3		1.3	A110 Manage data/files L190 Other Case Assessment, Development and Administration	L190 Other Case Assessment, Development and Administration	Verifying and cross checking products received photos for Etsy test results tab, organizing and communicating findings to NdIF	Grace Wainscoat
7/9/24	2.6		2.6	A110 Manage data/files L140 Document/File Management	L140 Document/File Management	Look for other test results to compare test results received from LTS for E015a and E033a and	Nuria de la Fuente
7/10/24	2.7		2.7	A101 Plan and prepare for L140 Document/File Management	L190 Other Case Assessment, Development and Administration	Inputting test results from test result folder into Etsy test result tab	Grace Wainscoat
7/10/24	2.3	#####	0	A105 Communicate (in firm) L190 Other Case Assessment, Development and Administration	L190 Other Case Assessment, Development and Administration	Meeting with Rachel, Rae, Nuria, and Walter regarding Prop 65 Database, trouble shooting data storage issues and setting up dropbox accounts, assigning tasks and organizing notes for next steps for Etsy data management	Grace Wainscoat

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
7/10/24	0.4		0.4	A110 Manage data/files L140 Document/File Management	L140 Document/File Management	Update docket, tasks and file; add contact information for reassigned judge/department	Jessica San Luis
7/10/24	2.3	#####	0	A101 Plan and prepare for L440 Other Trial Preparation and Support	L440 Other Trial Preparation and Support	Meeting with Rachel, Rae, Grace, and Walter regarding Prop 65 Database, trouble shooting data storage issues and setting up dropbox accounts, assigning tasks and organizing notes for next steps for Etsy data management	Nuria de la Fuente
7/10/24	0.1	#####	0	A101 Plan and prepare for L190 Other Case Assessment, Development and Administration	L190 Other Case Assessment, Development and Administration	Add to Dept. 20 notes for matter	Nuria de la Fuente
7/10/24	0.1		0.1	A110 Manage data/files L140 Document/File Management	L140 Document/File Management	Update matters note for Dept. 20 Information - Reassigned 7/9/24, with correct clerk's email address	Nuria de la Fuente
7/10/24	2.2	#####	0	A105 Communicate (in firm) P100 Project Administration	P100 Project Administration	Database assimilation of data for matter	Rachel Doughty
7/11/24	1.4		1.4	A110 Manage data/files L140 Document/File Management	L110 Fact Investigation/Development	Migrating document copies to new dropbox set up for Etsy/Prop 65 database starting with products listed in initial complaint and all test results and public health notices going toward knowledge	Grace Wainscoat
7/11/24	2.2		2.2	A101 Plan and prepare for L110 Fact Investigation/Development	L110 Fact Investigation/Development	Discovery timeline for Etsy products	Grace Wainscoat
7/11/24	0.7		0.7	A104 Review/analyze P280 Other	P280 Other	Review recent docket; update tasks and calendaring; review new department rules	Jessica San Luis
7/11/24	0.3		0.3	A108 Communicate (other external) L140 Document/File Management	L140 Document/File Management	Write reply email to project manager at LTS re. courtesy retesting of two samples in question	Nuria de la Fuente

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
7/11/24	0.3		0.3	A101 Plan and prepare for L190 Other Case Assessment, Development and Administration	L190 Other Case Assessment, Development and Administration	Calendar CD to file 170.6 for Judge Karin Schwartz for each atty	Nuria de la Fuente
7/11/24	0.1		0.1	A110 Manage data/files L190 Other Case Assessment, Development and Administration	L190 Other Case Assessment, Development and Administration	Confirm Judicial Assignment by visiting courts website	Nuria de la Fuente
7/11/24	0.2	#####	0	A101 Plan and prepare for L190 Other Case Assessment, Development and Administration	L190 Other Case Assessment, Development and Administration	Update Clio calendaring for each atty per newly assignment	Nuria de la Fuente
7/11/24	0.1		0.1	A101 Plan and prepare for L190 Other Case Assessment, Development and Administration	L190 Other Case Assessment, Development and Administration	Add Alameda County Sup Court Department 20 contact info	Nuria de la Fuente
7/11/24	0.3	#####	0	A101 Plan and prepare for L190 Other Case Assessment, Development and Administration	L190 Other Case Assessment, Development and Administration	Update templates for matter per newly assigned judge	Nuria de la Fuente
7/11/24	0.3		0.3	A105 Communicate (in firm) L140 Document/File Management	L140 Document/File Management	Confer w GW and help troubleshoot data transfer to box folder	Nuria de la Fuente
7/12/24	0.7		0.7	A101 Plan and prepare for L110 Fact Investigation/Development	L110 Fact Investigation/Development	Updating the discovery timeline for Etsy	Grace Wainscoat
7/12/24	2.7		2.7	A110 Manage data/files L140 Document/File Management	L110 Fact Investigation/Development	Migrating document copies to new dropbox set up for Etsy/Prop 65 database starting with products listed in initial complaint and all test results and public health notices going toward knowledge	Grace Wainscoat
7/12/24	2		2	A110 Manage data/files L140 Document/File Management	L140 Document/File Management	Update docket; set tasks and deadlines for district court matter; emails to RD, RL; check and update local rules, filing handbook and standing orders	Jessica San Luis
7/12/24	0.3		0.3	A110 Manage data/files L140 Document/File Management	L140 Document/File Management	Update templates per new magistrate judge	Nuria de la Fuente
7/12/24	0.3		0.3	A110 Manage data/files L140 Document/File Management	L140 Document/File Management	Mark trial court deadlines as complete per removed case	Nuria de la Fuente
7/12/24	0.2		0.2	A102 Research L140 Document/File Management	L140 Document/File Management	Review rules and deadlines to file to remove a case and confirm that Defs filed it in a timely manner	Nuria de la Fuente

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
7/12/24	1.2			A105 Communicate (in firm) 1.2 P100 Project Administration	P100 Project Administration	Call with Will Carlon re removal question, other procedural assistance	Rachel Doughty
7/15/24	0.9			A110 Manage data/files L140 0.9 Document/File Management	L110 Fact Investigation/Development	Organizing dropbox folders and documents for Etsy Cream / Prob 65 database + emailing findings	Grace Wainscoat
7/15/24	0.2			A105 Communicate (in firm) 0.2 L120 Analysis/Strategy	L120 Analysis/Strategy	Confer with RSD re: standing analysis in federal court	Jessica Blome
7/15/24	0.7			A110 Manage data/files L140 0.7 Document/File Management	L140 Document/File Management	Prepare COC and sample management letter for LTS lab to re-analyze samples	Nuria de la Fuente
7/15/24	0.1			A101 Plan and prepare for L440 0.1 Other Trial Preparation and Support	L440 Other Trial Preparation and Support	Verify contents of received slp packaging form LTS are enclosed in package received	Nuria de la Fuente
7/15/24	0.3			A110 Manage data/files L140 0.3 Document/File Management	L140 Document/File Management	Print sample and shipping labels and to send samples to LTS lab for retesting	Nuria de la Fuente
7/15/24	0.6			A110 Manage data/files L140 0.6 Document/File Management	L140 Document/File Management	Set clean work station, label, bag and package samples to send to lab	Nuria de la Fuente
7/15/24	0.4			A110 Manage data/files L140 0.4 Document/File Management	L140 Document/File Management	Take samples to post office to be sent to LTS lab for retesting for Hg	Nuria de la Fuente
7/15/24	0.2			A108 Communicate (other external) 0.2 L140 Document/File Management	L140 Document/File Management	Email project director at LTS lab the COC, sample management instructions and a request for careful packaging on return shipping to avoid spills	Nuria de la Fuente
7/15/24	0.2			A110 Manage data/files L140 0.2 Document/File Management	L140 Document/File Management	Update Etsy products spreadsheet to reflect location of products being shipped to lab and to update received product boxes form lab	Nuria de la Fuente
7/15/24	0.2			A105 Communicate (in firm) 0.2 L120 Analysis/Strategy	L120 Analysis/Strategy	Confer with JB re: standing analysis in federal court	Rachel Doughty
7/16/24	0.2			A107 Communicate (other outside counsel) 0.2 C200 Researching Law	C200 Researching Law	Exchange emails with WC, RSD re: jurisdictional questions, motion to remand	Jessica Blome
7/16/24	0.4			A102 Research C200 0.4 Researching Law	C200 Researching Law	Researching and discussing diversity jurisdiction with RSD	Jessica Blome

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
7/16/24	0.5		0.5	A105 Communicate (in firm) L120 Analysis/Strategy	L120 Analysis/Strategy	Confer with WC re: standing analysis	Jessica Blome
7/16/24	0.2		0.2	A101 Plan and prepare for L140 Document/File Management	L140 Document/File Management	Review GW emails re. data entry and organization into dropbox database	Nuria de la Fuente
7/16/24	0.2		0.2	A101 Plan and prepare for L140 Document/File Management	L140 Document/File Management	Troubleshoot access to dropbox folder and email RD	Nuria de la Fuente
7/16/24	0.2		0.2	A101 Plan and prepare for L140 Document/File Management	L140 Document/File Management	Confer w GW re. structure of Prop 65 Database and troubleshooting access to dropbox folder and email RD	Nuria de la Fuente
7/16/24	0.2		0.2	A105 Communicate (in firm) L140 Document/File Management	L140 Document/File Management	Confer w GW re. entering Non-GFL test results from the Beautywell into the Prop 65 Database	Nuria de la Fuente
7/16/24	0.1	#####	0	A105 Communicate (in firm) L110 Fact Investigation/Development	L110 Fact Investigation/Development	Move information to database	Rachel Doughty
7/16/24	2.4		2.4		L250 Other Written Motions and Submissions	Legal research re standing and remand/removal; review complaint and highlight standing bases claimed	Rachel Doughty
7/17/24	1.2		1.2	A101 Plan and prepare for L140 Document/File Management	L190 Other Case Assessment, Development and Administration	Starting Prop 65 Dropbox Written Protocol explaining the internal organization structure of the Prop 65 Dropbox and how to upload documents	Grace Wainscoat
7/17/24	0.7		0.7	A102 Research L140 Document/File Management	L190 Other Case Assessment, Development and Administration	Investigating issues with dropbox storage and communicating results	Grace Wainscoat
7/17/24	0.4		0.4	A102 Research L120 Analysis/Strategy	L120 Analysis/Strategy	Research timing/deadline for motion to remand	Jessica San Luis
7/17/24	0.1		0.1	A110 Manage data/files L140 Document/File Management	L140 Document/File Management	Forward usps receipt with explanation to administrative for sending samples to lab	Nuria de la Fuente

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
7/17/24	0.1			A108 Communicate (other external) L250 Other Written Motions and Submissions	L250 Other Written Motions and Submissions	Email re meet and confer re removal	Rachel Doughty
7/18/24	0.5			A103 Draft/revise L140 0.5 Document/File Management	L210 Pleadings	Draft / edit corporate disclosure and interested parties statement for review/filing	Jessica San Luis
7/18/24	1.4	#####		A103 Draft/revise L140 0 Document/File Management	L250 Other Written Motions and Submissions	Draft handbook for motion to remand; start templates for federal pleadings; email re: task assignments; research re: remand procedures	Jessica San Luis
7/18/24	0			A110 Manage data/files L140 0 Document/File Management	L140 Document/File Management	Prepare templates for Federal Court	Nuria de la Fuente
7/18/24	0.2			A110 Manage data/files L140 0.2 Document/File Management	L140 Document/File Management	Update Clio entries for OA with information provided by court clerk re: client zoom appearances	Nuria de la Fuente
7/18/24	0.2			A110 Manage data/files L140 0.2 Document/File Management	L140 Document/File Management	Update Clio notes for Public Zoom Link for District 1, Div. 1, whcih clients can use to appear	Nuria de la Fuente
7/18/24	0.1			A105 Communicate (in firm) L110 Fact 0.1 Investigation/Development	L110 Fact Investigation/Development	Confer w/ staff re Beautywell test results	Rachel Doughty
7/18/24	0.2			A105 Communicate (in firm) L120 Analysis/Strategy 0.2	L120 Analysis/Strategy	Confer w/ staff re strategy on mtn to compel arbitration	Rachel Doughty
7/19/24	0.2			A107 Communicate (other outside counsel) L120 0.2 Analysis/Strategy	L120 Analysis/Strategy	Briefly review materials re: arbitration, outline for motion for remand, confer with co-counsel re: same	Jessica Blome
7/19/24	0.3			A105 Communicate (in firm) L120 Analysis/Strategy 0.3	L120 Analysis/Strategy	Confer with RSD re: arbitration, removal	Jessica Blome
7/19/24	0.3			A105 Communicate (in firm) L120 Analysis/Strategy 0.3	L120 Analysis/Strategy	Confer with JB re: arbitration, removal	Jessica Blome
7/19/24	0.6			A110 Manage data/files L140 0.6 Document/File Management	L190 Other Case Assessment, Development and Administration	Update docket with motions; set calendar and task deadlines; email w/ RD, JB, WC, ND re: case	Jessica San Luis
7/19/24	0.5	#####		A103 Draft/revise L140 0 Document/File Management	L190 Other Case Assessment, Development and Administration	Editing templates for pleadings	Jessica San Luis
7/19/24	0.7			A103 Draft/revise L140 0.7 Document/File Management	L190 Other Case Assessment, Development and Administration	Update filing handbook, file	Jessica San Luis

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
7/19/24	0.4		0.4	A110 Manage data/files L140 0.4 Document/File Management	L140 Document/File Management	Update Clio calendar per continued CMC	Nuria de la Fuente
7/19/24	0.2		0.2	A102 Research C200 0.2 Researching Law	C200 Researching Law	Research std for remand	Rachel Doughty
7/19/24	0.3		0.3	A102 Research C200 0.3 Researching Law	C200 Researching Law	Review recent CA standing case (SAFER v. Inglewood)	Rachel Doughty
7/22/24	0.4		0.4	A105 Communicate (in firm) 0.4 L120 Analysis/Strategy	L120 Analysis/Strategy	Confer with RSD to discuss meet and confer over standing, arbitration	Jessica Blome
7/22/24	0.4		0.4	A104 Review/analyze L120 0.4 Analysis/Strategy	L120 Analysis/Strategy	Review amount in controversy memo, respond re: same	Jessica Blome
7/22/24	0.4		0.4	A110 Manage data/files L140 0.4 Document/File Management	L140 Document/File Management	Update docket and file; set tasks and deadlines for notice re: magistrate	Jessica San Luis
7/22/24	1		1	A103 Draft/revise L140 1 Document/File Management	L250 Other Written Motions and Submissions	Draft magistrate consent form and certificate of service for filing; email re: case deadlines; resetting deadlines after reassignment	Jessica San Luis
7/22/24	0.9		0.9		L250 Other Written Motions and Submissions	Prepare for meet and confer w/ opposing counsel re remand motion	Rachel Doughty
7/22/24	0.3		0.3	A108 Communicate (other external) 0.3 L250 Other Written Motions and Submissions	L250 Other Written Motions and Submissions	Meet and confer w/ opposing counsel re motion to remand & arbitration motion	Rachel Doughty
7/22/24	0.3		0.3	A108 Communicate (other external) 0.3 L120 Analysis/Strategy	L120 Analysis/Strategy	Email correspondence w/ AG re motions in federal court	Rachel Doughty
7/22/24	0.1		0.1	A106 Communicate (with client) 0.1 L120 Analysis/Strategy	L120 Analysis/Strategy	Email correspondence w/ client re notice of dismissal, motion to remand, notice of arbitration	Rachel Doughty
7/22/24	0.2		0.2	A105 Communicate (in firm) 0.2 L250 Other Written Motions and Submissions	L250 Other Written Motions and Submissions	Email correspondence w/ associate re motion to remand	Rachel Doughty
7/22/24	0.7	#####	0	A102 Research L110 Fact 0 Investigation/Development	L110 Fact Investigation/Development	Research Judge Chesney	Rachel Doughty
7/22/24	0.2			A105 Communicate (in firm) 0.2 C200 Researching Law	C200 Researching Law	Call w/ co-counsel re various authorities on Prop 65 standing federal court, including Luna	Rachel Doughty

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
7/22/24	1.7			A102 Research C200 1.7 Researching Law	C200 Researching Law	Research & prepare memorandum re removal, including accessing information from AG website re average award of penalties	Rachel Doughty
7/22/24	0.8			A103 Draft/revise L250 Other Written Motions and Submissions 0.8	L250 Other Written Motions and Submissions	Prepare Doughty Decl ISO Mtn to Remand	Rachel Doughty
7/23/24	0.8			A103 Draft/revise L140 0.8 Document/File Management	L250 Other Written Motions and Submissions	Draft frames for opposition motions; update docket and file	Jessica San Luis
7/23/24	0.7			A102 Research L140 0.7 Document/File Management	L140 Document/File Management	Review deadlines for initial disclosures and meet/confer	Jessica San Luis
7/23/24	0.5			A103 Draft/revise L250 Other Written Motions and Submissions 0.5	L250 Other Written Motions and Submissions	Draft stip to briefing schedule	Jessica San Luis
7/23/24	0.5			A108 Communicate (other external) P100 Project 0.5 Administration	P100 Project Administration	Email correspondence w/ opposing counsel proposing briefings schedule; send paralegal dates to add to calendar for new judge assignment	Rachel Doughty
7/23/24	0.1			A105 Communicate (in firm) 0.1 L240 Dispositive Motions	L240 Dispositive Motions	Confer w/ co-counsel re next steps on motion re arbitration	Rachel Doughty
7/23/24	0.5		0.5		L250 Other Written Motions and Submissions	Drafting motion to remand	Rachel Doughty
7/23/24	2.8			A108 Communicate (other external) P100 Project 2.8 Administration	P100 Project Administration	Draft motion to remand; confer w/ co-counsel re same; prepare decl. D.F. ISO MTR	Rachel Doughty
7/23/24	0.7			A106 Communicate (with client) L250 Other Written Motions and Submissions 0.7	L250 Other Written Motions and Submissions	Call with DF re her Decl. ISO motion to remand	Rachel Doughty
7/23/24	0.4			A108 Communicate (other external) P280 Other 0.4	P280 Other	Review emails from court and defendant regarding transfer, motion to compel, motion to dismiss, and deadlines	Rae Lovko
7/23/24	0.5			A104 Review/analyze L240 Dispositive Motions 0.5	L240 Dispositive Motions	Review defendant's motion to dismiss complaint	Rae Lovko

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
7/23/24	0.1		0.1	A105 Communicate (in firm) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Confer w/ co-counsel re next steps on motion re arbitration	Rae Lovko
7/23/24	0.1		0.1	A108 Communicate (other external) L240 Dispositive Motions	L240 Dispositive Motions	Contact Carlon regarding remand motion	Rae Lovko
7/23/24	1.7		1.7	A103 Draft/revise L240 Dispositive Motions	L240 Dispositive Motions	Draft factual and procedural background; research on no-merit letters	Rae Lovko
7/24/24	1.4		1.4	A103 Draft/revise L250 Other Written Motions and Submissions	L250 Other Written Motions and Submissions	Draft stip to briefing schedule; email to OC	Jessica San Luis
7/24/24	0.6		0.6	A103 Draft/revise L140 Document/File Management	L250 Other Written Motions and Submissions	Finalize drafts of frames for opposition motions	Jessica San Luis
7/24/24	0.8		0.8	A103 Draft/revise L250 Other Written Motions and Submissions	L250 Other Written Motions and Submissions	Prepare D. Fugere Decl	Rachel Doughty
7/24/24	0.2		0.2	A103 Draft/revise P280 Other Written Motions and Submissions	P280 Other	Prepare stipulation re scheduling	Rachel Doughty
7/24/24	0.1		0.1	A103 Draft/revise L250 Other Written Motions and Submissions	L250 Other Written Motions and Submissions	Prepare Danielle Decl.	Rachel Doughty
7/25/24	0.4		0.4	A110 Manage data/files L140 Document/File Management	L250 Other Written Motions and Submissions	Finalize stip for filing	Jessica San Luis
7/25/24	0.6		0.6	A110 Manage data/files L140 Document/File Management	L250 Other Written Motions and Submissions	Finalize stip for filing; draft proposed order	Jessica San Luis
7/25/24	4.8		4.8	A103 Draft/revise L250 Other Written Motions and Submissions	L250 Other Written Motions and Submissions	Prepare motion to remand	Rachel Doughty
7/25/24	0.2		0.2	A102 Research C200 Researching Law	C200 Researching Law	Research re choice of law provisions and arbitration cl. in CA and NY states	Rachel Doughty
7/25/24	3.4		3.4	A103 Draft/revise L250 Other Written Motions and Submissions	L250 Other Written Motions and Submissions	Research on arbitration agreements for representative claims	Rae Lovko
7/25/24	2		2	A103 Draft/revise L250 Other Written Motions and Submissions	L250 Other Written Motions and Submissions	Drafting of opp to arbitration motion	Rae Lovko
7/26/24	1.3		1.3	A103 Draft/revise L140 Document/File Management	L250 Other Written Motions and Submissions	Revise/edit stip to briefing schedule and proposed order; re-task all deadlines	Jessica San Luis
7/26/24	0.4		0.4	A110 Manage data/files L140 Document/File Management	L140 Document/File Management	Review Stip to Briefing Schedule and Proposed Order and confer w paralegal before filing	Nuria de la Fuente

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
7/26/24	0.6		0.6	A110 Manage data/files L140 Document/File Management	L140 Document/File Management	Edit format for for the Stip to Briefing Schedule and Proposed Order and save as PDF and start filing process	Nuria de la Fuente
7/26/24	0.1		0.1	A110 Manage data/files L140 Document/File Management	L140 Document/File Management	Email JSJ re. stopped filing process which is pending atty review and sign off	Nuria de la Fuente
7/26/24	0.3		0.3	A101 Plan and prepare for L440 Other Trial Preparation and Support	L440 Other Trial Preparation and Support	Review LTS Lab's re-analyzed test results and compare to previous results	Nuria de la Fuente
7/26/24	0.6		0.6	A101 Plan and prepare for L440 Other Trial Preparation and Support	L440 Other Trial Preparation and Support	Draft explanatory email to atty reporting new test results received from lab; Inquire re. proceed to follow for documenting re-analyzed samples and communication with lab re. sample management procedures	Nuria de la Fuente
7/26/24	0.4		0.4	A101 Plan and prepare for L440 Other Trial Preparation and Support	L440 Other Trial Preparation and Support	Save Hg test results to appropriate folders and organized to reflect reanalyzed sample location	Nuria de la Fuente
7/26/24	0.5		0.5	A108 Communicate (other external) L120 Analysis/Strategy	L120 Analysis/Strategy	Call w/ JW re three motions (remand, arbitration, dismiss) and choice of law	Rachel Doughty
7/26/24	0.2		0.2	A108 Communicate (other external) L120 Analysis/Strategy	L120 Analysis/Strategy	Discussion w/ JB re remedy upon loss of standing in federal court	Rachel Doughty
7/26/24	0.7		0.7	A102 Research P280 Other	P280 Other	Standing research	Rachel Doughty
7/26/24	0.1		0.1	A108 Communicate (other external) L120 Analysis/Strategy	L120 Analysis/Strategy	Confer w/ co-counsel re choice of law clause and public policy	Rachel Doughty
7/26/24	0.1		0.1	A102 Research P280 Other	P280 Other	Email correspondence w/ co-counsel re choice of law clause; research re CA supreme court on same	Rachel Doughty
7/26/24	0.4		0.4	A103 Draft/revise L250 Other Written Motions and Submissions	L250 Other Written Motions and Submissions	Review associate edits to motion to remand and revise	Rachel Doughty

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
7/26/24	0.8		0.8	A103 Draft/revise P280 Other	P280 Other	Revise proposed order on stip re briefing and hearing on mtgs to remand, dismiss, arbitration	Rachel Doughty
7/26/24	0.1		0.1	A108 Communicate (other external) P280 Other	P280 Other	Call with Chris Nidel re choice of law and NY UCL	Rachel Doughty
7/26/24	4		4	A102 Research L250 Other Written Motions and Submissions	L250 Other Written Motions and Submissions	Research on choice of law and choice of forum	Rae Lovko
7/26/24	0.6		0.6	A103 Draft/revise L250 Other Written Motions and Submissions	L250 Other Written Motions and Submissions	Draft factual background section of opp to motion to arbitrate	Rae Lovko
7/26/24	1.2		1.2	A103 Draft/revise L250 Other Written Motions and Submissions	L250 Other Written Motions and Submissions	Draft arguments in opp to motion to arbitrate	Rae Lovko
7/26/24	1		1	A102 Research L250 Other Written Motions and Submissions	L250 Other Written Motions and Submissions	Research on contract ambiguity; terms in Etsy contracts	Rae Lovko
7/27/24	0.3		0.3		L250 Other Written Motions and Submissions	Draft motion to remand	Rachel Doughty
7/28/24	6		6	A103 Draft/revise L250 Other Written Motions and Submissions	L250 Other Written Motions and Submissions	Research and drafting on motion re arbitration	Rae Lovko
7/29/24	0.3		0.3	A105 Communicate (in firm) L120 Analysis/Strategy	L120 Analysis/Strategy	Confer with RL re: arbitration argument	Jessica Blome
7/29/24	1.5		1.5	A110 Manage data/files L140 Document/File Management	L250 Other Written Motions and Submissions	Prepare and send chambers copy of filing per local rules	Jessica San Luis
7/29/24	0.2		0.2	A103 Draft/revise L250 Other Written Motions and Submissions	L250 Other Written Motions and Submissions	Draft RSD decl ISO mtn to remand	Rachel Doughty
7/29/24	0.3		0.3	A105 Communicate (in firm) L120 Analysis/Strategy	L120 Analysis/Strategy	Confer w/ staff re choice of law issues	Rachel Doughty
7/29/24	1.3		1.3	A103 Draft/revise L250 Other Written Motions and Submissions	L250 Other Written Motions and Submissions	Review formatting on final and send instructions to staff re TOA	Rachel Doughty
7/29/24	0.2		0.2	A105 Communicate (in firm) L250 Other Written Motions and Submissions	L250 Other Written Motions and Submissions	Discussion with RD regarding arbitration motion	Rae Lovko
7/30/24	3.6		3.6	A103 Draft/revise L140 Document/File Management	L250 Other Written Motions and Submissions	Revise/edit Table of Authorities; final edits to motion and declarations; filing with district court	Jessica San Luis

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
7/31/24	1.7			A101 Plan and prepare for L110 1.7 Fact Investigation/Development	L110 Fact Investigation/Development	Discovery timeline for Etsy	Grace Wainscoat
7/31/24	0.6			A110 Manage data/files L140 0.6 Document/File Management	L250 Other Written Motions and Submissions	Assemble chambers copies packet	Jessica San Luis
7/31/24	0.1	#####		A110 Manage data/files L140 0.1 Document/File Management	L140 Document/File Management	Check and update docket, file	Jessica San Luis
7/31/24	0.1			A110 Manage data/files L140 0.1 Document/File Management	L140 Document/File Management	Check and update docket, file	Jessica San Luis
7/31/24	1.1			A103 Draft/revise L140 1.1 Document/File Management	L250 Other Written Motions and Submissions	Edit templates; update docket and tasks/calendaring	Jessica San Luis
8/5/24	0.1	#####		A105 Communicate (in firm) L440 Other Trial Preparation and Support	L440 Other Trial Preparation and Support	Email to GW re. scheduling time to continue ETSY photo shoot	Nuria de la Fuente
8/5/24	0.3			A108 Communicate (other external) L440 Other Trial Preparation and Support	L440 Other Trial Preparation and Support	Prepare email and send to project manager at LTS Lab re. sending us corrected lab paper work	Nuria de la Fuente
8/5/24	0.1			A105 Communicate (in firm) L110 Fact Investigation/Development	L110 Fact Investigation/Development	Email correspondence w/ staff re test results	Rachel Doughty
8/6/24	0.2			A104 Review/analyze P280 0.2 Other	P280 Other	Review email re terms of use changes	Rachel Doughty
8/8/24	2.4			A101 Plan and prepare for L110 2.4 Fact Investigation/Development	L110 Fact Investigation/Development	Investigating missing product photos for Etsy, looking into product data entry errors and adjusting, taking pictures of products with NdIF, updating spreadsheet entries	Grace Wainscoat
8/8/24	1.9			A101 Plan and prepare for L440 Other Trial Preparation and Support	L440 Other Trial Preparation and Support	Work with GW to take photos of SLPs missing Products received pics, investigate which products' orders were cancelled by Etsy, get proof of this in folders and clarify which GIL numbers are duplicates	Nuria de la Fuente
8/12/24	3.7			A103 Draft/revise L250 Other Written Motions and Submissions	L250 Other Written Motions and Submissions	Research; draft opposition to Defendant RJN	Rae Lovko
8/12/24	1			A102 Research L240 Dispositive 1 Motions	L240 Dispositive Motions	Research re: motion to dismiss	Rae Lovko

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
8/13/24	0.1			A105 Communicate (in firm) L140 Document/File Management	L140 Document/File Management	Coordinate with GW to reschedule slp photoshoot and inventory	Nuria de la Fuente
8/13/24	2			A104 Review/analyze L430 Written Motions and Submissions	L430 Written Motions and Submissions	Review/edits to opposition motions re MTD and arbitration	Rae Lovko
8/13/24	1.3			A103 Draft/revise L250 Other Written Motions and Submissions	L250 Other Written Motions and Submissions	Drafting on opposition to arbitration motion	Rae Lovko
8/14/24	1.1			A101 Plan and prepare for L110 Fact Investigation/Development	L110 Fact Investigation/Development	Taking outstanding photos of SLPs with NdLF and updating spreadsheet information and "key", investigating missing products and updating folders with information	Grace Wainscoat
8/14/24	0.6			A110 Manage data/files L110 Fact Investigation/Development	L110 Fact Investigation/Development	Entering cancelled products in "cancelled" tab and updating other locations with this information	Grace Wainscoat
8/14/24	0.9			A101 Plan and prepare for L440 Other Trial Preparation and Support	L440 Other Trial Preparation and Support	Finish photographing SLP's received and tracking/taking inventory of slp GIL duplicates or cancelled orders w/ GW; continue oorganizinf information into products folders and spreadsheet	Nuria de la Fuente
8/14/24	4.9			A102 Research L430 Written Motions and Submissions	L430 Written Motions and Submissions	Research on agency principles and interpretation re scope of arbitration agreement terms	Rae Lovko
8/14/24	2.3			A103 Draft/revise L430 Written Motions and Submissions	L430 Written Motions and Submissions	Draft opposition to motion to arbitrate (section on scope of terms)	Rae Lovko
8/15/24	0.7	#####		A110 Manage data/files L140 Document/File Management	L190 Other Case Assessment, Development and Administration	Migrating documents from DropBox to OneDrive for Prop 65 database storage	Grace Wainscoat
8/15/24	0.2			A105 Communicate (in firm) L430 Written Motions and Submissions	L430 Written Motions and Submissions	Strategize with RL regarding opp to motion to arbitrate	Rachel Doughty
8/15/24	1.8			A103 Draft/revise L430 Written Motions and Submissions	L430 Written Motions and Submissions	Draft argument in opposition to motion to arbitrate	Rae Lovko
8/15/24	0.2			A105 Communicate (in firm) L430 Written Motions and Submissions	L430 Written Motions and Submissions	Strategize with RD regarding opp to motion to arbitrate	Rae Lovko

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
8/15/24	1.5			A103 Draft/revise L430 Written 1.5 Motions and Submissions	L430 Written Motions and Submissions	Draft Fugere declaration/communicate with client about declaration for opposition to motion to arbitrate	Rae Lovko
8/15/24	2			A103 Draft/revise L430 Written 2 Motions and Submissions	L430 Written Motions and Submissions	Draft Lovko decl in opp to motion to arbitrate	Rae Lovko
8/15/24	0.8			A102 Research L430 Written 0.8 Motions and Submissions	L430 Written Motions and Submissions	Research re choice of law	Rae Lovko
8/16/24	0.9	#####		A110 Manage data/files L140 0 Document/File Management	L140 Document/File Management	Standardizing OneDrive organization of files for database storage; updating guide/handbook	Grace Wainscoat
8/16/24	0.1		0.1		L250 Other Written Motions and Submissions	Check crt dkt for updates	Nuria de la Fuente
8/16/24	0.1		0.1	A103 Draft/revise P280 Other	P280 Other	Confer w/ client re declaration re Mtn re arbitration	Rachel Doughty
8/18/24	1.7			A103 Draft/revise L250 Other 1.7 Motions and Submissions	L250 Other Written Motions and Submissions	Opposition to choice of forum and arbitration motions	Rachel Doughty
8/18/24	3			A102 Research L430 Written 3 Motions and Submissions	L430 Written Motions and Submissions	Research for opp to motion to arbitrate	Rae Lovko
8/18/24	2.5			A103 Draft/revise L430 Written 2.5 Motions and Submissions	L430 Written Motions and Submissions	Edit opp to motion to arbitrate	Rae Lovko
8/19/24	0.5			A105 Communicate (in firm) 0.5 L120 Analysis/Strategy	L120 Analysis/Strategy	Call with RSD to discuss strategy	Jessica Blome
8/19/24	0.9			A103 Draft/revise L140 0.9 Document/File Management	L250 Other Written Motions and Submissions	Draft Request for Judicial Notice	Jessica San Luis
8/19/24	0.1		0.1	A110 Manage data/files L140 0.1 Document/File Management	L140 Document/File Management	Check court dkt's for updates	Nuria de la Fuente
8/19/24	0.3		0.3	A105 Communicate (in firm) L250 Other Written Motions and Submissions	L250 Other Written Motions and Submissions	Confer w/ co-counsel re arbitration mtn argument	Rachel Doughty
8/19/24	2.2			A103 Draft/revise L250 Other 2.2 Motions and Submissions	L250 Other Written Motions and Submissions	Opposition to choice of forum and arbitration motions; confer w/ co-counsel re same	Rachel Doughty
8/19/24	2.8			A103 Draft/revise L430 Written 2.8 Motions and Submissions	L430 Written Motions and Submissions	Edit opp to arbitration	Rae Lovko
8/19/24	5.5			A103 Draft/revise L240 5.5 Dispositive Motions	L240 Dispositive Motions	Draft opp to motion to dismiss	Rae Lovko

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
8/20/24	0.5		0.5	A105 Communicate (in firm) 0.5 L120 Analysis/Strategy	L120 Analysis/Strategy	Confer with RSD re: strategy for response to Motion to Compel Arbitration	Jessica Blome
8/20/24	1.6		1.6	A103 Draft/revise L140 1.6 Document/File Management	L250 Other Written Motions and Submissions	Draft RJD, Proposed Orders, update templates	Jessica San Luis
8/20/24	0.4	#####	0	A105 Communicate (in firm) 0 P280 Other	P280 Other	Meeting w/ NLDF re: templates and edits, filing and preparing exhibits	Jessica San Luis
8/20/24	4.7	50.00%	2.35	A103 Draft/revise L140 2.35 Document/File Management	L250 Other Written Motions and Submissions	Draft Tables of Authority for briefs; update and edit tables	Jessica San Luis
8/20/24	0.3	#####	0	A110 Manage data/files L140 0 Document/File Management	L140 Document/File Management	Update templates to troubleshoot filed updating issue	Nuria de la Fuente
8/20/24	0.1	#####	0	A110 Manage data/files L140 0 Document/File Management	L140 Document/File Management	Update Caption template and confer w/ JSL	Nuria de la Fuente
8/20/24	0.2	#####	0	A110 Manage data/files L140 0 Document/File Management	L140 Document/File Management	Update DC templates with judges initials	Nuria de la Fuente
8/20/24	0.7		0.7	A110 Manage data/files L140 0.7 Document/File Management	L140 Document/File Management	Correct orientation of the EXH 1 to Lovko Decl 2023 Dec Ltr documents and correct exhibit divider font size to be uniform throughout	Nuria de la Fuente
8/20/24	1.5		1.5	A103 Draft/revise L240 1.5 Dispositive Motions	L240 Dispositive Motions	Edit opp to motion to dismiss	Rachel Doughty
8/20/24	0.8		0.8	A103 Draft/revise P280 Other 0.8	P280 Other	Prepare Rae Lovko declaration in support of opp to motion to arbitrate	Rachel Doughty
8/20/24	0.8		0.8	A103 Draft/revise L250 Other Written Motions and Submissions	L250 Other Written Motions and Submissions	Prepare opposition to mtng to arbitrate	Rachel Doughty
8/20/24	0.7		0.7	A103 Draft/revise L250 Other Written Motions and Submissions	L250 Other Written Motions and Submissions	Prepare opposition to motion to compel arbitration	Rachel Doughty
8/20/24	0.8		0.8	A103 Draft/revise L240 Dispositive Motions	L240 Dispositive Motions	Finalize opp to motion to dismiss	Rachel Doughty
8/20/24	2.6		2.6	A103 Draft/revise L240 Dispositive Motions	L240 Dispositive Motions	Edit opp to MTD	Rae Lovko
8/20/24	0.7		0.7	A103 Draft/revise L430 Written Motions and Submissions	L430 Written Motions and Submissions	Draft RJD for Opp to MTD	Rae Lovko

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
8/20/24	0.4		0.4	A104 Review/analyze L430 Written Motions and Submissions	L430 Written Motions and Submissions	Review papers for filing	Rae Lovko
8/21/24	0.3		0.3	A110 Manage data/files L140 Document/File Management	L140 Document/File Management	Update docket and file with pleadings; email to RD/RL	Jessica San Luis
8/21/24	0.2		0.2	A102 Research C200 Researching Law	C200 Researching Law	Review Mahram v. The Kroger Co. (arbitration case) in anticipation of hearing on motion to arbitrate	Rachel Doughty
8/22/24	0.2		0.2	A105 Communicate (in firm) P100 Project Administration	P100 Project Administration	Review case deadlines and assign out work on matter	Rachel Doughty
8/26/24	2		2	A110 Manage data/files L140 Document/File Management	L250 Other Written Motions and Submissions	Assemble courtesy copy binder; email to Court	Jessica San Luis
8/26/24	0.6		0.6	A103 Draft/revise L140 Document/File Management	L210 Pleadings	Finalize FAC for filing	Jessica San Luis
8/26/24	0.1		0.1	A110 Manage data/files L140 Document/File Management	L140 Document/File Management	Download and save order directing Deffs to submit courtesy copies and email attys to notify	Nuria de la Fuente
8/26/24	0.1		0.1	A105 Communicate (in firm) L140 Document/File Management	L140 Document/File Management	Reply to JSL email re. protocol to follow to avoid duplicative docketing	Nuria de la Fuente
8/27/24	0.5		0.5	A102 Research C200 Researching Law	C200 Researching Law	Review FRCP 26 for disclosures and deadlines	Jessica San Luis
8/29/24	0.1		0.1	A110 Manage data/files L140 Document/File Management	L140 Document/File Management	Check and update docket, file	Jessica San Luis
8/29/24	0.4		0.4	A104 Review/analyze L140 Document/File Management	C200 Researching Law	Review local rules re: appearance; draft notice of appearance; email w/RB	Jessica San Luis
8/30/24	1.1		1.1	A110 Manage data/files L140 Document/File Management	L210 Pleadings	Update all deadlines and tasks; draft templates for upcoming filings;	Jessica San Luis
8/30/24	0.4		0.4	A110 Manage data/files L140 Document/File Management	L140 Document/File Management	Draft Notice of Appearance for RB and send to paralegal for review	Nuria de la Fuente
9/3/24	0.1		0.1	A105 Communicate (in firm) P400 Initial Document Preparation/Filing	P400 Initial Document Preparation/Filing	Call RB to get PACER credentials to file Not of Appearance	Nuria de la Fuente
9/3/24	0.1		0.1	A101 Plan and prepare for L440 Other Trial Preparation and Support	L440 Other Trial Preparation and Support	Verify when next timeline investigation is due and calendar for self	Nuria de la Fuente
9/4/24	0.7		0.7	A102 Research L140 Document/File Management	C200 Researching Law	Research re: related cases; email to RD	Jessica San Luis

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
9/4/24	0.9		0.9	A104 Review/analyze L430 Written Motions and Submissions	L430 Written Motions and Submissions	Review def opp to remand motion	Rae Lovko
9/4/24	0.8		0.8	A102 Research L430 Written Motions and Submissions	L430 Written Motions and Submissions	Research on settlement demands as evidence of amount in controversy	Rae Lovko
9/4/24	3.6		3.6	A103 Draft/revise L430 Written Motions and Submissions	L430 Written Motions and Submissions	Reply for remand motion	Rae Lovko
9/5/24	4.8		4.8	A103 Draft/revise L430 Written Motions and Submissions	L430 Written Motions and Submissions	Draft and edit reply re motion to remand	Rae Lovko
9/5/24	2.2		2.2	A102 Research L430 Written Motions and Submissions	L430 Written Motions and Submissions	Research on use of attorney fees to calculate amount in controversy	Rae Lovko
9/6/24	0.4		0.4	A110 Manage data/files L140 Document/File Management	L140 Document/File Management	Update file and docket; email to RD/RL/RB; update calendars	Jessica San Luis
9/6/24	4.5		4.5	A103 Draft/revise L430 Written Motions and Submissions	L430 Written Motions and Submissions	Reply to Motion to Remand	Rae Lovko
9/6/24	2.1		2.1	A102 Research L430 Written Motions and Submissions	L430 Written Motions and Submissions	Research on attorneys fees and aggregating; standing	Rae Lovko
9/10/24	0.3	#####	0	A108 Communicate (other than external) C200 Researching Law	C200 Researching Law	Call with M. Bender re NY law re mercury in cosmetics	Rachel Doughty
9/10/24	0.5	#####	0	A102 Research P280 Other	P280 Other	Research on N.Y. Envtl. Conserv. Law § 37-0117	Rae Lovko
9/11/24	0.2		0.2	A105 Communicate (in firm) L140 Document/File Management	P280 Other	Meeting w/HK re: hearing prep binders	Jessica San Luis
9/11/24	2.8		2.8	A103 Draft/revise L250 Other Written Motions and Submissions	L250 Other Written Motions and Submissions	Draft reply ISO mtn to remand	Rachel Doughty
9/12/24	0.1		0.1	A101 Plan and prepare for L140 Document/File Management	L140 Document/File Management	Retrieve binders with HK to prepare briefing binders for each motion	Nuria de la Fuente
9/12/24	0.8		0.8	A110 Manage data/files L140 Document/File Management	L140 Document/File Management	Print binder tab labels for Mot to Dismiss and Mot to Remand and assemble into binders	Nuria de la Fuente
9/12/24	2.3		2.3	A110 Manage data/files L140 Document/File Management	L140 Document/File Management	Assemble Mot to Dismiss Briefing and Mot to Compel Arbitration binders with tab dividers and Mot documents	Nuria de la Fuente

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
9/12/24	0.2		0.2	A105 Communicate (in firm) L240 Dispositive Motions	L240 Dispositive Motions	Confer w/ colleague re remand reply mtn content on atty fees aggregation	Rachel Doughty
9/12/24	0.2		0.2	A103 Draft/revise L250 Other Written Motions and Submissions	L250 Other Written Motions and Submissions	Revise reply brief	Rachel Doughty
9/12/24	4.4		4.4	A103 Draft/revise L430 Written Motions and Submissions	L430 Written Motions and Submissions	Draft intro in reply brief; edit arguments	Rae Lovko
9/12/24	1.2		1.2	A102 Research L430 Written Motions and Submissions	L430 Written Motions and Submissions	Research on AYS v Sherwin-Williams and related cases (for reply to remand motion)	Rae Lovko
9/13/24	3.5		3.5	A103 Draft/revise L430 Written Motions and Submissions	L430 Written Motions and Submissions	Edit of remand reply motion	Rae Lovko
9/16/24	1.6		1.6	A103 Draft/revise L140 Document/File Management	L250 Other Written Motions and Submissions	Edit and run Table of Authorities in reply brief	Jessica San Luis
9/16/24	0.1		0.1	A110 Manage data/files L140 Document/File Management	L140 Document/File Management	Check court dkt for updates	Nuria de la Fuente
9/16/24	1.5		1.5	A103 Draft/revise L430 Written Motions and Submissions	L430 Written Motions and Submissions	Edit reply motion re remand	Rae Lovko
9/16/24	1.9		1.9	A102 Research L430 Written Motions and Submissions	L430 Written Motions and Submissions	Research on settlement demands	Rae Lovko
9/17/24	4.7		4.7	A103 Draft/revise L140 Document/File Management	L250 Other Written Motions and Submissions	Finalize reply in support of remand motion; assemble declaration and exhibits; email to RD/RL/ND	Jessica San Luis
9/17/24	3.9		3.9	A110 Manage data/files L140 Document/File Management	L140 Document/File Management	Perform part of the Discovery timeline search and capture images	Nuria de la Fuente
9/17/24	0.9		0.9	A103 Draft/revise P280 Other	P280 Other	Prepare reply ISO mtn to Remand	Rachel Doughty
9/17/24	0.2		0.2		L250 Other Written Motions and Submissions	Reach out to various client contacts to get declaration ISO	Rachel Doughty
9/17/24	0.1		0.1	A105 Communicate (in firm) L430 Written Motions and Submissions	L430 Written Motions and Submissions	Discussion with staff regarding formatting and filing	Rae Lovko
9/17/24	1.9		1.9	A103 Draft/revise L430 Written Motions and Submissions	L430 Written Motions and Submissions	Edit remand reply; client declaration	Rae Lovko

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
9/17/24	0.2		0.2	A105 Communicate (in firm) L430 Written Motions and Submissions	L430 Written Motions and Submissions	Discussion with RD about remand reply	Rae Lovko
9/18/24	0.4		0.4	A110 Manage data/files L140 Document/File Management	L140 Document/File Management	Download and update docket; email to RD/RL	Jessica San Luis
9/18/24	0.1		0.1	A108 Communicate (other external) P280 Other	P280 Other	Prepare folders for client and AG for three upcoming motions	Rachel Doughty
9/18/24	0.5		0.5	A104 Review/analyze L430 Written Motions and Submissions	L430 Written Motions and Submissions	Initial receipt and review of Def reply papers	Rae Lovko
9/19/24	0.6	#####	0	A110 Manage data/files L140 Document/File Management	L250 Other Written Motions and Submissions	Upload dockets to Box.com; update docket and file	Jessica San Luis
9/19/24	0.2		0.2	A106 Communicate (with client) L120 Analysis/Strategy	L120 Analysis/Strategy	Email client re three arguments	Rachel Doughty
9/19/24	0.5		0.5	A106 Communicate (with client) L120 Analysis/Strategy	L120 Analysis/Strategy	Email to client re risks and 3 motions in court	Rachel Doughty
9/19/24	0.2		0.2	A106 Communicate (with client) L120 Analysis/Strategy	L120 Analysis/Strategy	Email client re three arguments	Rae Lovko
9/20/24	0.3		0.3	A104 Review/analyze L140 Document/File Management	L250 Other Written Motions and Submissions	Review docket for prep binders	Jessica San Luis
9/20/24	0.2	#####	0		L190 Other Case Assessment, Development and Administration	Prepare representation agreement	Rachel Doughty
9/23/24	0.1		0.1	A105 Communicate (in firm) L190 Other Case Assessment, Development and Administration	L190 Other Case Assessment, Development and Administration	Confer with JSL re: case management conference statement content, deadline	Jessica Blome
9/23/24	0.2		0.2	A104 Review/analyze L250 Other Written Motions and Submissions	L230 Court Mandated Conferences	Review CMC statement, confer with JSL re: same	Jessica Blome
9/23/24	1.9		1.9	A103 Draft/revise L140 Document/File Management	L140 Document/File Management	Review docket, draft CMC Statement for trial court; emails to RL/ND	Jessica San Luis
9/23/24	0.7		0.7	A110 Manage data/files L140 Document/File Management	L140 Document/File Management	Look closely at trial court days and figure-out why CMC date on court website is still set for Complex judge not the reassigned judge and write to paralegal re. task	Nuria de la Fuente
9/23/24	0.4		0.4	A110 Manage data/files L140 Document/File Management	L140 Document/File Management	Try calling and email Dept 20th, Judge Schwartz clerk to clarify Initial CMC hearing date per date posted on website	Nuria de la Fuente

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
9/23/24	0.2			A105 Communicate (in firm) L140 Document/File Management	L140 Document/File Management	Email w paralegal re 28 U.S.C. § 1446(d) and case being placed in special status of: Stay - Removal to Federal Court	Nuria de la Fuente
9/24/24	1.2			A110 Manage data/files L140 Document/File Management	L140 Document/File Management	Reset all deadlines and tasks; update file and docket; email w/ND	Jessica San Luis
9/24/24	0.2			A105 Communicate (in firm) P400 Initial Document Preparation/Filing	P400 Initial Document Preparation/Filing	Strategy re hearings call with JW	Rachel Doughty
9/25/24	0.3			A103 Draft/revise P280 Other	P280 Other	Review emails and contacts; email to ND with tasks	Jessica San Luis
9/25/24	1.2	#####		A103 Draft/revise L190 Other Case Assessment, Development and Administration	L190 Other Case Assessment, Development and Administration	Prepare representation agreement	Rachel Doughty
9/25/24	0.4			A103 Draft/revise P280 Other	P280 Other	Prepare fees and costs chart for Etsy	Rachel Doughty
9/26/24	1			A104 Review/analyze L140 Document/File Management	L140 Document/File Management	Review deadlines, set tasks for upcoming filings; call to court re: hearing notice	Jessica San Luis
9/26/24	0.3			A110 Manage data/files L140 Document/File Management	L140 Document/File Management	Add list of AYS contacts to Clio	Nuria de la Fuente
9/26/24	0.4				L250 Other Written Motions and Submissions	Prepare for hearing on arbitration agreement	Rachel Doughty
9/28/24	0.2			A104 Review/analyze L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Review ADR certificate and send to client for approval; email to opposing counsel seeking M&C on same	Rachel Doughty
9/30/24	1.4			A103 Draft/revise L140 Document/File Management	L230 Court Mandated Conferences	Draft CMC Statement for district court; email to RD/RL	Jessica San Luis
9/30/24	0.5			A104 Review/analyze L440 Other Trial Preparation and Support	L440 Other Trial Preparation and Support	Review filings to prepare for oral argument on arbitration	Rachel Doughty
10/1/24	1.7			A103 Draft/revise L140 Document/File Management	L250 Other Written Motions and Submissions	edit and update binders for hearings; review docket	Jessica San Luis
10/1/24	0.2			A103 Draft/revise L250 Other Written Motions and Submissions	L310 Written Discovery	Prepare Rule 26 disclosures	Rachel Doughty

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
10/1/24	0.8		0.8	A106 Communicate (with client) P280 Other	P280 Other	Meet with client re risks associated with three motions; also rep agreement; also arbitration	Rachel Doughty
10/1/24	1.4		1.4	A104 Review/analyze L440 Other Trial Preparation and Support	L440 Other Trial Preparation and Support	Prepare for mtg with client re arbitration agreement	Rachel Doughty
10/1/24	0.6		0.6	A104 Review/analyze L240 Dispositive Motions	L240 Dispositive Motions	Review motion to dismiss briefing in preparation for call with client	Rachel Doughty
10/1/24	0.2		0.2	A106 Communicate (with client) P280 Other	P280 Other	Email with client re pre-hearing to do (ADR certification, Rule 26, etc.)	Rachel Doughty
10/1/24	0.9		0.9	A106 Communicate (with client) P280 Other	P280 Other	Meeting with clients	Rae Lovko
10/2/24	0.3		0.3	A105 Communicate (in firm) L140 Document/File Management	L140 Document/File Management	Confer with HK re. tabs for Motion Replies in binders; Instruct on Avery templates to print binder tab tables and how to abbreviate titles for tabs for the	Nuria de la Fuente
10/2/24	0.4		0.4	A110 Manage data/files L140 Document/File Management	L140 Document/File Management	Create and add labels to Responses tabs in Motion binders	Nuria de la Fuente
10/3/24	0.6		0.6	A103 Draft/revise L140 Document/File Management	L430 Written Motions and Submissions	Pretrial motions	Jessica San Luis
10/3/24	0.3		0.3	A101 Plan and prepare for L250 Other Written Motions and Submissions	L310 Written Discovery	Prepare for Rule 26 conference	Rachel Doughty
10/3/24	0.3		0.3		L240 Dispositive Motions	Prepare for M&C	Rachel Doughty
10/3/24	0.3		0.3	A108 Communicate (other external) L250 Other Written Motions and Submissions	L310 Written Discovery	M&C Rule 26	Rachel Doughty
10/3/24	0.2		0.2	A108 Communicate (other external) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Send email requesting settlement of Etsy matter	Rachel Doughty
10/4/24	0.1		0.1	A105 Communicate (in firm) P500 Negotiation/Revision/Response	P500 Negotiation/Revision/Responses	Check in with RSD re: attorney rates for settlement	Jessica Blome

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
10/4/24	0.2		0.2	A103 Draft/revise L140 0.2 Document/File Management	L160 Settlement/Non-Binding ADR	Finalize ADR certification for filing	Jessica San Luis
10/4/24	0.5		0.5	A110 Manage data/files L140 0.5 Document/File Management	L140 Document/File Management	Update docket and file; update tasks and calendaring; email to team	Jessica San Luis
10/4/24	0.1		0.1	A110 Manage data/files L140 0.1 Document/File Management	L140 Document/File Management	Check court dockets and update as needed	Nuria de la Fuente
10/4/24	0.4		0.4	A106 Communicate (with client) L120 Analysis/Strategy	L120 Analysis/Strategy	Confer w/ client re settlement and costs of litigation	Rachel Doughty
10/7/24	0.4		0.4	A110 Manage data/files L140 0.4 Document/File Management	L140 Document/File Management	Update file and calendar; email re: deadlines	Jessica San Luis
10/7/24	0.1		0.1	A110 Manage data/files L140 0.1 Document/File Management	L140 Document/File Management	Confirm USPS received dkt, Not of Case Rescheduling or Relocation, had been saved	Nuria de la Fuente
10/9/24	0.1		0.1	A105 Communicate (in firm) L140 Document/File Management	L140 Document/File Management	Follow up w paralegal re. remote appearance task	Nuria de la Fuente
10/9/24	0.2		0.2	A108 Communicate (other external) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Email correspondence w/ opposing counsel transmitting settlement agreement after finalizing settlement	Rachel Doughty
10/11/24	0.1		0.1	A105 Communicate (in firm) L140 Document/File Management	L140 Document/File Management	Confer with JSL re. tasks for today	Nuria de la Fuente
10/11/24	0.1		0.1	A110 Manage data/files L140 0.1 Document/File Management	L140 Document/File Management	Check court dockets	Nuria de la Fuente
10/11/24	1.8		1.8	A110 Manage data/files L140 1.8 Document/File Management	L140 Document/File Management	Perform Discovery Timeline taking screenshots of still listed SLP sold out	Nuria de la Fuente
10/14/24	0.6		0.6	A103 Draft/revise L140 0.6 Document/File Management	L430 Written Motions and Submissions	Draft dismissal of claim	Jessica San Luis
10/15/24	0.5		0.5	A108 Communicate (other external) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Call and then email to opposing counsel re settlement terms	Rachel Doughty
10/16/24	0.1		0.1	A110 Manage data/files L140 0.1 Document/File Management	L140 Document/File Management	Check and update docket	Jessica San Luis
10/17/24	1		1	A110 Manage data/files L140 1 Document/File Management	L140 Document/File Management	Use generic templates to update trial court templates for POS, Briefs, Caption, J. Stipulation and Declaration.	Nuria de la Fuente

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
10/17/24	0.2			A110 Manage data/files L140 0.2 Document/File Management	L140 Document/File Management	Check court website and most recent filings to figure out OC service address for POS	Nuria de la Fuente
10/17/24	0.1			A110 Manage data/files L140 0.1 Document/File Management	L140 Document/File Management	Confer with paralegal re. OC address to use for POS templates	Nuria de la Fuente
10/17/24	0.3			A110 Manage data/files L140 0.3 Document/File Management	L140 Document/File Management	Correct address for OC on POS for on templates	Nuria de la Fuente
10/17/24	0.8			A103 Draft/revise L160 0.8 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Prepare settlement offer and send to client	Rachel Doughty
10/18/24	3.5			A110 Manage data/files L140 3.5 Document/File Management	L140 Document/File Management	Continue performing discovery timeline with image search, site search and also capture and insert thumbnail images that are missing from Disco timeline sheet	Nuria de la Fuente
10/21/24	3.4			A110 Manage data/files L140 3.4 Document/File Management	L140 Document/File Management	Finish up discovery timeline	Nuria de la Fuente
10/22/24	0.1			A110 Manage data/files L140 0.1 Document/File Management	L140 Document/File Management	Check court docket for updates	Nuria de la Fuente
10/24/24	0.1			A110 Manage data/files L140 0.1 Document/File Management	L140 Document/File Management	Forward RD the email notice re. Plumas County DA not opening Notice email and inquire re updating copy of service spreadsheet	Nuria de la Fuente
10/28/24	0.3			A110 Manage data/files L140 0.3 Document/File Management	L140 Document/File Management	Update corr folder with gmail Not. of unread service of 1/18/24 Prop 65 Not to Plumas county AG and updated the Copy of Proposition 65 Service List and add note for RD	Nuria de la Fuente
10/28/24	0.4			A106 Communicate (with client) 0.4 L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Call with client; send settlement offer to opposing counsel	Rachel Doughty
10/30/24	0.2			A110 Manage data/files L140 0.2 Document/File Management	L140 Document/File Management	Add photos of products received that were taken with GW to each products folder	Nuria de la Fuente
10/30/24	0.1			A110 Manage data/files L140 0.1 Document/File Management	L140 Document/File Management	Check court dockets for updates	Nuria de la Fuente
10/31/24	0.5			A104 Review/analyze L140 0.5 Document/File Management	C200 Researching Law	Review FRCP for dismissal of claim procedure; email to RSD	Jessica San Luis

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
10/31/24	0.3		0.3	A102 Research C200 Researching Law	C200 Researching Law	Research rules 41 and 15 re dismissal of UCL claim	Rachel Doughty
11/4/24	0.1		0.1	A110 Manage data/files L140 Document/File Management	L140 Document/File Management	Update Etsy Discovery Timeline Sheet to reflect upcoming Discovery timeline task	Nuria de la Fuente
11/4/24	1.6		1.6	A110 Manage data/files L140 Document/File Management	L140 Document/File Management	Retrieve photos of products received from google photos and save to appropriate LP folders and combine into pdfs	Nuria de la Fuente
11/4/24	0.1		0.1	A101 Plan and prepare for L140 Document/File Management	L140 Document/File Management	Send task status update on Etsy photos of products received to JSL	Nuria de la Fuente
11/4/24	0.5		0.5	A103 Draft/revise L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR		FALSE
11/6/24	0.1		0.1	A110 Manage data/files L140 Document/File Management	L140 Document/File Management	Review online court system for case updates	Nuria de la Fuente
11/6/24	0.3		0.3	A106 Communicate (with client) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Confer w/ client re settlement offer	Rachel Doughty
11/6/24	0.3		0.3	A106 Communicate (with client) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Call with client re potential settlement terms	Rachel Doughty
11/6/24	0.1		0.1	A103 Draft/revise L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Prepare settlement offer	Rachel Doughty
11/11/24	0.4		0.4	A104 Review/analyze L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Review Etsy offer of settlement; convey to client with my thoughts on same	Rachel Doughty
11/13/24	0.1		0.1	A110 Manage data/files L140 Document/File Management	L140 Document/File Management	Check docket and hearing dates on court's website; update internal docket and file	Jessica San Luis
11/13/24	0.1		0.1	A106 Communicate (with client) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Follow up by email with client re latest settlement offer from Etsy	Rachel Doughty
11/14/24	0.1		0.1	A106 Communicate (with client) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Email and call with client re Etsy settlement offer	Rachel Doughty
11/14/24	0.3		0.3	A106 Communicate (with client) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Speak with client to get settlement authorization	Rachel Doughty
11/14/24	0.8		0.8	A103 Draft/revise L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Prepare settlement offer	Rachel Doughty

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
11/19/24	0.4			A103 Draft/revise L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Prepare settlement offer; confer w/ client re same; send revised offer to opposing counsel	Rachel Doughty
11/20/24	0.1			A110 Manage data/files L140 Document/File Management	C200 Researching Law	Check court's website and update docket, file; notify attorneys of new filings/deadlines	Jessica San Luis
11/21/24	0.8			A108 Communicate (other external) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Add up lodestar and respond to opposing counsel re settlement position	Rachel Doughty
11/26/24	0.2			A110 Manage data/files L140 Document/File Management	L140 Document/File Management	Update docket and file with clerk's order; update calendars with Zoom info for hearing; email to RSD/RL	Jessica San Luis
11/26/24	0.1			A110 Manage data/files L140 Document/File Management	L140 Document/File Management	Review online court system for case updates	Nuria de la Fuente
12/9/24	0.1			A110 Manage data/files L140 Document/File Management	L140 Document/File Management	Check court docket for updated filings; confirm hearing and task deadlines in file	Jessica San Luis
12/9/24	0.1			A104 Review/analyze L140 Document/File Management	C200 Researching Law	Review email from court; email to RSD; update calendar for CMC hearing	Jessica San Luis
12/9/24	0.1			A110 Manage data/files L140 Document/File Management	L140 Document/File Management	Update file and tasks/calendar	Jessica San Luis
12/9/24	0.1			A108 Communicate (other external) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Email correspondence w/ clerk of court re CMC and opposing counsel re discussion of settlement terms	Rachel Doughty
12/10/24	0.2			A101 Plan and prepare for L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Prepare for settlement meeting with opposing counsel	Rachel Doughty
12/16/24	0.3			A110 Manage data/files L140 Document/File Management	L140 Document/File Management	Update file with deadlines and tasks; email with RL	Jessica San Luis
12/16/24	0.3			A105 Communicate (in firm) L310 Written Discovery	L310 Written Discovery	Communicate with RD re initial disclosures	Rae Lovko
12/19/24	0.1			A110 Manage data/files L140 Document/File Management	L140 Document/File Management	Check court docket for new filings; update file	Jessica San Luis
12/26/24	0.1			A110 Manage data/files L140 Document/File Management	L140 Document/File Management	Check court website for docket entries; update file and tasks/deadlines	Jessica San Luis
12/26/24	0.6			A103 Draft/revise L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Accept settlement offer from Etsy, add clarification of terms	Rachel Doughty

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
12/31/24	0.4		0.4	A104 Review/analyze L190 Other Case Assessment, Development and Administration	C200 Researching Law	Review local and FRCP rules for settlement practice and procedure; email to RSD	Jessica San Luis
1/3/25	0.1		0.1	A104 Review/analyze L140 Document/File Management	L140 Document/File Management	Review and update tasks in file	Jessica San Luis
1/3/25	0.1		0.1	A105 Communicate (in firm) L250 Other Written Motions and Submissions	L230 Court Mandated Conferences	Confer w/ staff re deadline to M&C before CMC	Rachel Doughty
1/6/25	0.1		0.1	A110 Manage data/files L140 Document/File Management	L140 Document/File Management	Check court docket; update file	Jessica San Luis
1/6/25	0.2		0.2	A103 Draft/revise L250 Other Written Motions and Submissions	L230 Court Mandated Conferences	Draft CM statement for hearing 1/24/25	Jessica San Luis
1/7/25	0.2		0.2	A108 Communicate (other external) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Email to opposing counsel re notifying the court of settlement in principle	Rachel Doughty
1/9/25	0.4		0.4	A103 Draft/revise L250 Other Written Motions and Submissions	L160 Settlement/Non-Binding ADR	Draft Notice of Settlement for district court; email to RSD	Jessica San Luis
1/9/25	0.7		0.7	A103 Draft/revise L250 Other Written Motions and Submissions	L160 Settlement/Non-Binding ADR	Prepare notice of settlement and proposed order and send same to opposing counsel	Rachel Doughty
1/13/25	0.1		0.1	A108 Communicate (other external) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Email CORR w/ opposing counsel re filing notice of settlement	Rachel Doughty
1/14/25	0.2		0.2	A108 Communicate (other external) L250 Other Written Motions and Submissions	L230 Court Mandated Conferences	Confer w/ opposing counsel re filing CMCS in the court	Rachel Doughty
1/15/25	0.5		0.5	A103 Draft/revise L140 Document/File Management	L160 Settlement/Non-Binding ADR	Finalize and file notice of settlement; file with court; update docket and file	Jessica San Luis
1/15/25	0.1		0.1	A110 Manage data/files L140 Document/File Management	L140 Document/File Management	Check court docket for updated filings and/or hearings; review file for deadlines and tasks; update docket/file	Jessica San Luis
1/15/25	0.1		0.1	A103 Draft/revise L250 Other Written Motions and Submissions	L160 Settlement/Non-Binding ADR	Finalize notice of settlement	Rachel Doughty
1/18/25	0.7		0.7	A103 Draft/revise L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Review prior settlements; send fees motion sample to staff to prepare; finalize fees spreadsheet; write to opposing counsel re 11 ccr 3003.45 days deadline as well as need to report settlement to the AG	Rachel Doughty

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
1/20/25	2.4		2.4	A103 Draft/revise L250 Other Written Motions and Submissions	L160 Settlement/Non-Binding ADR	Draft declaration for settlement	Jessica San Luis
1/20/25	0.2		0.2	A108 Communicate (other external) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Respond to defense counsel delay on settlement terms	Rachel Doughty
1/21/25	0.1		0.1	A110 Manage data/files L140 Document/File Management	L140 Document/File Management	Check court docket for filings and hearing dates; update file and tasks/calendar	Jessica San Luis
1/21/25	0.9		0.9	A103 Draft/revise L140 Document/File Management	L430 Written Motions and Submissions	Draft and edit motion to approve settlement; email and call with RSD; review settlement offers and update file	Jessica San Luis
1/21/25	0.2		0.2	A103 Draft/revise L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Prepare motion to approve	Rachel Doughty
1/21/25	1.1		1.1	A103 Draft/revise L250 Other Written Motions and Submissions	L460 Post-Trial Motions and Submissions	Prepare motion to approve	Rachel Doughty
1/22/25	0.2		0.2	A104 Review/analyze L140 Document/File Management	L140 Document/File Management	Check docket and hearing dates; update file; email to RSD	Jessica San Luis
1/22/25	1.1		1.1	A103 Draft/revise L140 Document/File Management	L430 Written Motions and Submissions	Finalize joint settlement motion schedule and proposed order; file with court; update docket and tasks	Jessica San Luis
1/22/25	1.6		1.6	A103 Draft/revise L250 Other Written Motions and Submissions	L460 Post-Trial Motions and Submissions	Prepare proposed joint settlement schedule & proposed order; send same to opposing counsel	Rachel Doughty
1/28/25	0.1		0.1	A110 Manage data/files L140 Document/File Management	L140 Document/File Management	Check court's docket and update file; confirm deadlines and hearing dates	Jessica San Luis
1/28/25	0.2		0.2	A110 Manage data/files L140 Document/File Management	L140 Document/File Management	Review hearing deadlines and update docket and file; check tasks	Jessica San Luis
1/31/25	1.6		1.6	A103 Draft/revise L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Prepare settlement agreement	Rachel Doughty
2/1/25	0.7		0.7	A103 Draft/revise L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Prepare settlement agreement	Rachel Doughty
2/2/25	0.1		0.1	A106 Communicate (with client) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Send text to client and prior settlement in principle terms	Rachel Doughty

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
2/3/25	0.1			A110 Manage data/files L140 Document/File Management	L140 Document/File Management	Check court docket for updated filings; confirm hearings and deadlines; update file	Jessica San Luis
2/3/25	0.5			A106 Communicate (with client) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Confer w/ client re settlement strategy	Rachel Doughty
2/3/25	0.2			A105 Communicate (in firm) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Check numbers in declaration	Rachel Doughty
2/3/25	0.9		0.9		L160 Settlement/Non-Binding ADR	Prepare revised settlement agreement after call with client	Rachel Doughty
2/3/25	0.2			A103 Draft/revise L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Review further edits from client, incorporate, send to opposing counsel	Rachel Doughty
2/3/25	0.1			A108 Communicate (other external) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Email CORR w/ opposing counsel re settlement terms	Rachel Doughty
2/4/25	0.2			A103 Draft/revise L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Prepare motion to approve decl rsd ISO	Rachel Doughty
2/4/25	0.4			A103 Draft/revise L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Revise settlement agreement	Rachel Doughty
2/5/25	0.2			A103 Draft/revise L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Prepare motion to approve decl rsd ISO	Rachel Doughty
2/5/25	0.2			A106 Communicate (with client) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Confer w/ client re redline	Rachel Doughty
2/6/25	0.1			A108 Communicate (other external) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Send settlement offer to opposing counsel	Rachel Doughty
2/11/25	0.1	100.00%		A105 Communicate (in firm) L160 Settlement/Non-Binding ADR	L460 Post-Trial Motions and Submissions	Confer with RD regarding status of settlement and motion for approval	Cyrus Moshiri
2/11/25	0.1			A110 Manage data/files L140 Document/File Management	L140 Document/File Management	Check court docket for updates; confirm tasks and deadlines; update chart	Jessica San Luis
2/11/25	0.6			A108 Communicate (other external) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Call with opposing counsel re settlement language	Rachel Doughty
2/11/25	0			A108 Communicate (other external) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Review settlement lanaguage and send to opposing counsel with follow up question re proposed 4.1 last para language	Rachel Doughty

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
2/12/25	0.4		0.4	A108 Communicate (other external) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Review settlement after call w/ opposing counsel and send same to client w/ comments	Rachel Doughty
2/13/25	0.3	100.00%		A104 Review/analyze L160 Settlement/Non-Binding ADR	L460 Post-Trial Motions and Submissions	Review material portions of complaint in preparation for motion to approve settlement	Cyrus Moshiri
2/13/25	0.1		0.1	A104 Review/analyze L160 Settlement/Non-Binding ADR	L460 Post-Trial Motions and Submissions	Review breakdown of fees and costs incurred by Plaintiffs' counsel in preparation for motion to approve settlement	Cyrus Moshiri
2/13/25	0.2	100.00%		A104 Review/analyze L160 Settlement/Non-Binding ADR	L460 Post-Trial Motions and Submissions	Review correspondence with opposing counsel detailing agreed-upon terms in preparation of motion to approve settlement	Cyrus Moshiri
2/13/25	0.3	100.00%		A104 Review/analyze L120 Analysis/Strategy	L460 Post-Trial Motions and Submissions	Review Defendant Etys' sales declaration including dates and total number of units sold in California and compare to proposed terms and settlement windows in preparation for motion to approve settlement	Cyrus Moshiri
2/13/25	1.3	100.00%		A105 Communicate (in firm) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Confer with partner RD re motion for settlement approval and status of negotiations with opposing counsel	Cyrus Moshiri
2/13/25	0.1		0.1	A104 Review/analyze L140 Document/File Management	L140 Document/File Management	Review docket and file, update tasks and calendar	Jessica San Luis
2/13/25	0.3		0.3	A104 Review/analyze L140 Document/File Management	L430 Written Motions and Submissions	Review drafts and templates in motions file; email to CM	Jessica San Luis
2/13/25	0.1		0.1	A106 Communicate (with client) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Reach out to client re changes to settlement	Rachel Doughty
2/13/25	0.3		0.3	A103 Draft/revise L250 Other Written Motions and Submissions	L460 Post-Trial Motions and Submissions	Prepare motion to approve	Rachel Doughty
2/13/25	0.6		0.6	A103 Draft/revise L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Revise language in paragraph 4 of proposed settlement	Rachel Doughty
2/13/25	1.3		1.3	A105 Communicate (in firm) L250 Other Written Motions and Submissions	L460 Post-Trial Motions and Submissions	Confer w/ staff re preparation of fee motion	Rachel Doughty

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
2/13/25	1.5			A103 Draft/revise L160 1.5 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Revise settlement agreement as redlined by opposing counsel	Rachel Doughty
2/14/25	0.5			A103 Draft/revise L250 Other Written Motions and Submissions 0.5	L460 Post-Trial Motions and Submissions	Draft and format frames for notice of motion, declaration in support and proposed order for settlement motion; email to CM	Jessica San Luis
2/14/25	0.5			A106 Communicate (with client) L160 Settlement/Non-Binding ADR 0.5	L160 Settlement/Non-Binding ADR	Confer w/ client re settlement terms, incorporate changes, send to opposing counsel	Rachel Doughty
2/14/25	0.9			A104 Review/analyze L160 0.9 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Review new settlement draft from opposing counsel; multiple calls with client re same; send back to opposing counsel	Rachel Doughty
2/17/25	0.1			A110 Manage data/files L140 0.1 Document/File Management	L140 Document/File Management	Check court docket for new documents; update file	Jessica San Luis
2/17/25	0.1			A108 Communicate (other external) L160 Settlement/Non-Binding ADR 0.1	L160 Settlement/Non-Binding ADR	Email correspondence w/ opposing counsel re release	Rachel Doughty
2/17/25	0.1			A105 Communicate (in firm) L160 Settlement/Non-Binding ADR 0.1	L160 Settlement/Non-Binding ADR	Confer w/ staff re prep of notice of settlement	Rachel Doughty
2/18/25	0.2			A104 Review/analyze L230 0.2 Court Mandated Conferences	L230 Court Mandated Conferences	Review court order and deadlines for hearing; update deadlines in calendar and file; email to RSD/RL re: clerk's order and new deadlines	Jessica San Luis
2/18/25	0.1			A108 Communicate (other external) L250 Other Written Motions and Submissions 0.1	L230 Court Mandated Conferences	Email correspondence w/ opposing counsel re joint case management statement	Rachel Doughty
2/19/25	0.2			A104 Review/analyze L160 0.2 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Review edits from opposing counsel and client	Rachel Doughty
2/19/25	0.8			A106 Communicate (with client) L160 Settlement/Non-Binding ADR 0.8	L160 Settlement/Non-Binding ADR	Call with client re settlement edits; send edits to opposing counsel	Rachel Doughty
2/20/25	0.2			A108 Communicate (other external) L160 Settlement/Non-Binding ADR 0.2	L160 Settlement/Non-Binding ADR	Review client suggested final edit and send to Etsy.	Rachel Doughty
2/21/25	0.1			A106 Communicate (with client) L160 Settlement/Non-Binding ADR 0.1	L160 Settlement/Non-Binding ADR	Seek settlement signature from client	Rachel Doughty
2/21/25	0.1			A107 Communicate (other outside counsel) L160 0.1 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Discuss filing today with court	Rachel Doughty

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
2/21/25	0.2		0.2	A103 Draft/revise L250 Other Written Motions and Submissions	L230 Court Mandated Conferences	Prepare draft CMCS	Rachel Doughty
2/21/25	1		1	A103 Draft/revise L250 Other Written Motions and Submissions	L230 Court Mandated Conferences	Finalize and file CMCS	Rachel Doughty
2/24/25	0.2		0.2	A110 Manage data/files L430 Written Motions and Submissions	L460 Post-Trial Motions and Submissions	Update docket and file with order; update tasks and deadlines; review settlement documents; email to RSD/RL	Jessica San Luis
2/24/25	0.6		0.6	A103 Draft/revise P500 Negotiation/Revision/Response	L460 Post-Trial Motions and Submissions	Update and add tasks and deadlines based on settlement agreement	Jessica San Luis
2/24/25	0.4		0.4	A101 Plan and prepare for L190 Other Case Assessment, Development and Administration	L460 Post-Trial Motions and Submissions	Task all dates related to the joint stip and order; add to calendar; email to RSD/RL/CM regarding deadlines for settlement	Jessica San Luis
2/24/25	0.1		0.1	A104 Review/analyze L190 Other Case Assessment, Development and Administration	L190 Other Case Assessment, Development and Administration	Check court docket for new filings or orders; update file and tasks	Jessica San Luis
2/24/25	0.2		0.2	A105 Communicate (in firm) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Process settlement documents	Rachel Doughty
2/25/25	0.4	100.00%	0	A104 Review/analyze L160 Settlement/Non-Binding ADR	L460 Post-Trial Motions and Submissions	Review material terms of settlement agreement and release for preparation of motion to approve settlement per Health and Safety Code 25249.7(f)	Cyrus Moshiri
2/25/25	0.3		0.3	A105 Communicate (in firm) L160 Settlement/Non-Binding ADR	L460 Post-Trial Motions and Submissions	Confer with partner RD and JSL re settlement deadlines and notifying AG re settlement	Cyrus Moshiri
2/25/25	0.4		0.4	A105 Communicate (in firm) L120 Analysis/Strategy	L460 Post-Trial Motions and Submissions	Meeting with RSD/CM re: settlement; filing notice; drafting motion to approve; deadlines and tasks; notification of AG's office	Jessica San Luis
2/25/25	1.6		1.6	A103 Draft/revise L250 Other Written Motions and Submissions	L460 Post-Trial Motions and Submissions	Draft Notice of Settlement for filing with district court per order; review court rules and update file	Jessica San Luis
2/25/25	0.4		0.4	A103 Draft/revise L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Confer w/ staff re preparing motion to approve	Rachel Doughty

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
2/25/25	0.2		0.2	A103 Draft/revise L160 0.2 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Prepare notice of settlement and send to staff to file	Rachel Doughty
2/27/25	2.6		2.6	A103 Draft/revise L160 2.6 Settlement/Non-Binding ADR	L460 Post-Trial Motions and Submissions	Prepare notice and memorandum of points and authorities in support of motion to approve settlement	Cyrus Moshiri
2/27/25	0.2		0.2	A104 Review/analyze L160 0.2 Settlement/Non-Binding ADR	L460 Post-Trial Motions and Submissions	Review OEHHA Prop 65 list to update memorandum in support of motion to approve settlement	Cyrus Moshiri
2/27/25	0.4	100.00%	0	A104 Review/analyze L160 0 Settlement/Non-Binding ADR	L460 Post-Trial Motions and Submissions	Research notes of decision regarding Section 664.6 and Shephardize to ensure citable and valid caselaw	Cyrus Moshiri
2/27/25	0.2		0.2	A101 Plan and prepare for L120 0 Analysis/Strategy	L120 Analysis/Strategy	Meet with RSD re: next deadlines and tasks; assign workflow for following week; update file	Jessica San Luis
2/28/25	0.2	100.00%	0	A101 Plan and prepare for L160 0 Settlement/Non-Binding ADR	L460 Post-Trial Motions and Submissions	Review procedural requirements for Prop 65 settlement in federal district court in preparation for filing motion to approve	Cyrus Moshiri
2/28/25	1.2		1.2	A103 Draft/revise L160 1.2 Settlement/Non-Binding ADR	L460 Post-Trial Motions and Submissions	Continue to prepare memorandum of points and authorities in support of motion to approve settlement, adding authority supporting argument that civil penalty amount is reasonable	Cyrus Moshiri
2/28/25	1.8		1.8	A103 Draft/revise L160 1.8 Settlement/Non-Binding ADR	L460 Post-Trial Motions and Submissions	Prepare attorney declaration in support of motion to approve settlement	Cyrus Moshiri
2/28/25	0.2	100.00%	0	A104 Review/analyze L160 0 Settlement/Non-Binding ADR	L460 Post-Trial Motions and Submissions	Review lab test results from Legend Tech Services to determine PPM for inclusion in attorney declaration in support of motion to approve	Cyrus Moshiri

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
2/28/25	0.1			A101 Plan and prepare for L160 0.1 Settlement/Non-Binding ADR	L460 Post-Trial Motions and Submissions	Review declaration of R. Drury in support of fees' motion on recent similar matter to support attorney declaration for motion to approve and claimed rates in fee recovery	Cyrus Moshiri
2/28/25	0.6			A101 Plan and prepare for L160 0.6 Settlement/Non-Binding ADR	L460 Post-Trial Motions and Submissions	Prepare exhibits for attorney declaration in support of motion to approve, add citations to memorandum of points and authorities consistent with declaration	Cyrus Moshiri
2/28/25	0.2			A103 Draft/revise L160 0.2 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Revise settlement per AG direction	Rachel Doughty
3/2/25	3.4			A103 Draft/revise L250 Other Written Motions and 3.4 Submissions	L460 Post-Trial Motions and Submissions	Prepare Motion to Approve	Rachel Doughty
3/3/25	0.1	100.00%		A101 Plan and prepare for L160 0 Settlement/Non-Binding ADR	L460 Post-Trial Motions and Submissions	Review press release draft for input of photographs corresponding to products subject to injunctive terms of settlement	Cyrus Moshiri
3/3/25	0.1			A105 Communicate (in firm) L160 Settlement/Non-Binding 0.1 ADR	L460 Post-Trial Motions and Submissions	Confer with RD regarding finalizing motion to approve	Cyrus Moshiri
3/3/25	0.4			A104 Review/analyze L160 0.4 Settlement/Non-Binding ADR	L460 Post-Trial Motions and Submissions	Analyze revisions and comments by partner RD to memorandum in support of motion to approve to finalize filing and supporting papers	Cyrus Moshiri
3/3/25	0.1			A105 Communicate (in firm) L160 Settlement/Non-Binding 0.1 ADR	L460 Post-Trial Motions and Submissions	Confer with JSL re citations, table of authorities and exhibits for motion to approve	Cyrus Moshiri
3/3/25	2.6			A103 Draft/revise L160 2.6 Settlement/Non-Binding ADR	L460 Post-Trial Motions and Submissions	Continue to prepare memorandum in support of motion to approve settlement adding suggested edits and incorporating revisions by partner RD	Cyrus Moshiri

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
3/3/25	0.3			A104 Review/analyze L160 0.3 Settlement/Non-Binding ADR	L460 Post-Trial Motions and Submissions	Review relevant portions of appellate decision in Lee v. Amazon regarding court's dicta on dangers of exposure for inclusion in motion to approve settlement	Cyrus Moshiri
3/3/25	0.2			A103 Draft/revise L160 0.2 Settlement/Non-Binding ADR	L460 Post-Trial Motions and Submissions	Direct staff re edits to mtn to approve	Rachel Doughty
3/3/25	0.1			A108 Communicate (other external) L160 Settlement/Non-Binding ADR 0.1	L160 Settlement/Non-Binding ADR	Send signed settlement agreement to opposing counsel	Rachel Doughty
3/4/25	0.8			A103 Draft/revise L160 0.8 Settlement/Non-Binding ADR	L460 Post-Trial Motions and Submissions	Finalize memorandum supporting motion to approve including section with arguments and authorities supporting fee recovery	Cyrus Moshiri
3/4/25	2.7			A103 Draft/revise L160 2.7 Settlement/Non-Binding ADR	L460 Post-Trial Motions and Submissions	Add all citations to memorandum for motion to approve and supporting attorney declaration	Cyrus Moshiri
3/4/25	0.2			A105 Communicate (in firm) L160 Settlement/Non-Binding ADR 0.2	L460 Post-Trial Motions and Submissions	Confer with partner RD to finalize motion to approve and supporting declaration	Cyrus Moshiri
3/4/25	0.1			A104 Review/analyze L160 0.1 Settlement/Non-Binding ADR	L460 Post-Trial Motions and Submissions	Review email and fully executed settlement agreement from opposing counsel to finalize declaration supporting motion to approve	Cyrus Moshiri
3/4/25	0.3			A103 Draft/revise L160 0.3 Settlement/Non-Binding ADR	L460 Post-Trial Motions and Submissions	Revise attorney declaration in support of motion to approve including data concerning total fees and expenses incurred	Cyrus Moshiri
3/4/25	0.5			A101 Plan and prepare for L160 0.5 Settlement/Non-Binding ADR	L460 Post-Trial Motions and Submissions	Prepare and determine relevant exhibits for inclusion in attorney declaration supporting motion to approve	Cyrus Moshiri
3/4/25	0.6			A104 Review/analyze L160 0.6 Settlement/Non-Binding ADR	L460 Post-Trial Motions and Submissions	Shephardize all cases cited in memorandum supporting motion to approve, review and replace with greater authority	Cyrus Moshiri

Date	Hours	Hours Rdxn	Hours After RDXN	Activity category	UTBMS task code	Description	User
3/4/25	0.1		0.1	A104 Review/analyze L190 Other Case Assessment, Development and Administration	L460 Post-Trial Motions and Submissions	Check court docket for new filings or orders; update file and tasks	Jessica San Luis
3/4/25	0.1		0.1	A105 Communicate (in firm) L250 Other Written Motions and Submissions	L460 Post-Trial Motions and Submissions	Confer w/ staff re progress on fees motion	Rachel Doughty
3/5/25	0.1		0.1	A104 Review/analyze L160 Settlement/Non-Binding ADR	L460 Post-Trial Motions and Submissions	Review Alameda Superior Court local rules to respond to JSL regarding preparation of exhibits to attorney declaration	Cyrus Moshiri
3/5/25	3.3		3.3	A103 Draft/revise L250 Other Written Motions and Submissions	L460 Post-Trial Motions and Submissions	Revise/edit MTA and declaration for RSD; edit and finalize exhibits and proposed order; review citations and check for bluebook; run TOC and TOA; format tables; email to CM/RSD	Jessica San Luis
3/5/25	0.2		0.2	A103 Draft/revise L160 Settlement/Non-Binding ADR	L460 Post-Trial Motions and Submissions	Review MTA progress	Rachel Doughty
3/6/25	1.4		1.4	A101 Plan and prepare for L160 Settlement/Non-Binding ADR	L460 Post-Trial Motions and Submissions	Review JSL edits, finalize citations and ensure in accordance with supporting declaration	Cyrus Moshiri
3/6/25	0.2		0.2	A103 Draft/revise L160 Settlement/Non-Binding ADR	L460 Post-Trial Motions and Submissions	Revise proposed order and review exhibits in accordance with attorney declaration, confer with JSL and RD to finalize	Cyrus Moshiri
3/7/25	0.9		0.9	A103 Draft/revise L250 Other Written Motions and Submissions	L460 Post-Trial Motions and Submissions	Finish edits to MPA and notice	Jessica San Luis
3/9/25	3.5		3.5	A103 Draft/revise L460 Post-Trial Motions and Submissions	L460 Post-Trial Motions and Submissions	Prepare motion to approve	Rachel Doughty